

Julie & Ken Sutton

161 Worcester Street

North Grafton MA 01536

RECEIVED TOWN CLERK
GRAFTON, MA

2020 MAR 19 AM 9:47

RECEIVED

MAR 19 2020

Zoning Board of Appeals

Dear Planning Board,

I am writing to you as an abutter to 165 Worcester Street as I do not support the request for a construction of a 2 family house on this lot. We have lived next to this lot for 31 years and have witnessed the many changes through the decades on the property. The lot is known to be contaminated with chemicals, oil, and waste from prior commercial business operating from this address. Surface water run off is a problem, prior owners never did any basic Civil Engineering to correct stormwater runoff problems. As this lot is under sized for the intended use, I feel more up-front work should be required by the Town of Grafton before considering a variance to ensure problems are not just pushed to current abutters.

In 1989 when we first moved in 165 Worcester St. was the home of Grafton Auto Body owned by Floyd Danielson. Junk cars were parked on the property and gas and oil from these could drain onto the ground, Floyd also disposed of solvents by dumping them in the ground. During the installation of sewer lines under Worcester St. in September 1998 gasoline was detected under Worcester St. by the contractor. The Town of Grafton had the problem investigated and then three old fuel tanks were removed along with soil surrounding the tanks, see attached report 2-12393. This cleaned up a small portion of the property but left the rest contaminated. There was no subsequent cleanup effort.

In 2010 I had to send to Grafton Foreign Motors a letter as they had drainage problems and diverted the rain water runoff from the garage into my back yard. The pipe was removed but no work was ever done to fix the runoff problems from the building. The lot is very small and can not absorb the amount of rain run off during storms when there is a structure and paved parking area. The garage flooded periodically due to excess water build up.

On February 3, 2011 the garage at 165 Worcester St. fell during a snow storm and Grafton Foreign Motors which was in operation at the time moved to a new location. The garage was demolished and some of the debris was removed and some buried. There was a pit within the garage that was left from the original Pontiac business. The pit had a drain at the bottom which drained direct into the soil under the garage. This was never tested and cleaned up. The contaminants remain buried and have been undisturbed since 2011. The owner Patrice Rooney tried to sell the property right away as the lot was grandfathered with building rights for 3 years. No one would buy the property as the cost and environmental clean were to cost prohibitive.

I believe that prior to granting an planning exception current contamination needs to be tested and remediated by a professional company. A comprehensive plan should be developed and shared with neighbors so that any run off during excavation does not contaminate abutting properties. A storm water management plan should be presented and approved by the Town of Grafton, so problems do not just get pushed to neighbors when construction begins. There is also a drain line under the property

that runs from 163 Worcester St to my yard at 161 Worcester St. This needs to be on a construction plan so it is not broken during any excavation work which would then allow contaminants to flow directly into my yard. This property has been abandoned for years due to the cost of the work to properly remediate and control contaminants.

Photo of last structure at 165 Worcester St., from Feb. 2011



2-12393

165 Worcester Road
Grafton

NOTIFICATION

SCANNED

RECEIVED TOWN CLERK
GRAFTON, MA

2020 MAR 19 AM 9:47

RECEIVED

MAR 19 2020

Zoning Board of Appeals



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-101

RELEASE LOG FORM

Release Tracking Number

2-12393

A. LOG INFORMATION:

Log Date:

9-9-98

Log Time:

3:00

Check one:

☐ AM ☒ PM

Use of Form:
(check one)

☒ Initial Office
☐ Boston
☐ Amended

TYPE OF CALL (check one):

☒ Release or TOR
☐ Complaint ☐ Inquiry

CALLER (check one):

☐ PRP
☒ Public Safety Official
☐ Other Government Agency
☐ Citizen
☐ Anonymous
☐ LSP or PRP Agent
☐ Other Person:

DISPOSITION OF CALL (check the one most applicable disposition below):

If selecting one of the two following options, assign a Release Tracking Number (RTN) in the space provided above:

☒ Reportable Release or Threat of Release
☐ Release or Threat of Release Less Than Reporting Threshold

Select one of the two following options only if an RTN was previously assigned:

☐ Release Notification Retraction (with BWSC-103 only)
☐ Not a 21E Release

If selecting any option below, do not assign an RTN:

☐ Release or Threat of Release Exempt from Reporting Requirements (not referred)
☐ Report Referred to Other Agency or Division
☐ No Action Taken

Reporting Person: Raymond Guibette (chief)

Telephone: (508) 839-4606

Ext.:

Organization: Grafton Fire Dept.

B. RELEASE OR THREAT OF RELEASE LOCATION:

Street: 165 Worcester St.

Location Aid:

City/Town: Grafton

Adequately Regulated Status:

Fee Status:

Type of Location (check all that apply): ☐ Commercial ☐ Industrial ☐ Residential ☐ School ☐ Municipal ☐ State
☐ Federal ☐ Right of Way ☒ Roadway ☐ Water Body ☐ Open Space Other:

Release Tracking Number of Associated Transition or Tier Classified Site, if any:

C. RELEASE OR THREAT OF RELEASE (TOR) INFORMATION:

Notification Date, if different from log date:

"One Year" Status Date, if not one year after notification date:

Date and time reporting person obtained knowledge of the Release or TOR. Date: 9-8-99 Time: 1:00 ☐ AM ☒ PM

IF KNOWN, record date and time Release or TOR occurred. Date: Time: ☐ AM ☐ PM

Check all conditions that apply to the Release or Threat of Release:

2 HOUR REPORTING CONDITIONS

☐ Sudden Release
☐ Threat of Sudden Release
☐ Oil Sheen on Surface Water
☐ Poses Imminent Hazard
☐ Could Pose Imminent Hazard
☐ Release Detected in Private Well
☐ Release to Storm Drain
☐ Sanitary Sewer Release (Imminent Hazard Only)

72 HOUR REPORTING CONDITIONS

☐ Subsurface NAPL = or > 1/2 Inch
☐ UST Release
☐ Threat of UST Release
☐ Release to Groundwater near Water Supply
☐ Release to Groundwater near School or Residence

120 DAY REPORTING CONDITIONS

☐ Release of HM(s) to Soil or Groundwater > RC(s)
☒ Release of Oil to Soil > RC(s) and Affecting > 2 Cubic Yards
☐ Release of Oil to Groundwater > RC(s)
☐ Subsurface NAPL = or > 1/8 Inch and < 1/2 Inch
☐ Check here if Substantial Release Migration exists in connection with 120 Day Reporting Conditions

Source of Release or TOR (check all that apply): ☐ UST ☐ Pipe/Hose/Line ☐ AST ☐ Drums ☐ Transformer ☐ Boat

☐ Tanker Truck ☐ Vehicle ☒ Unknown ☐ Other Specify:

Federal LUST Eligible? ☐ Yes ☒ No ☐ Unknown

SECTION C IS CONTINUED ON THE NEXT PAGE.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-101

RELEASE LOG FORM

Release Tracking Number

2-12393

C. RELEASE OR THREAT OF RELEASE (TOR) INFORMATION: (continued)

Type of Release or TOR (check all that apply): ☐ Leak ☐ Spill ☐ Rupture ☐ Dumping ☐ Tank Removal ☐ Overfill
☐ Vehicle Accident ☐ Test Failure ☐ Fire ☐ Threat Only ☒ Unknown ☐ Other Specify: _____

Identify Media and Receptors Affected: (check all that apply) ☐ Air ☐ Groundwater ☐ Surface Water ☐ Sediments ☒ Soil
☐ Wetlands ☐ Storm Drain ☐ Paved Surface ☐ Private Well ☐ Public Water Supply ☐ Zone 2 ☐ Residence
☐ School ☐ Unknown ☐ Other Specify: _____

O or HM Released

(check one)

CAS # (if known)

Amount or Conc.

Units

RCs Exceeded?

Gasoline

☒ O

☐ HM

☐ O

☐ HM

Description of Release or Threat of Release:

Encountered gasoline contaminated soil while digging a new sewer line trench.

D. PRP INFORMATION:

☐ PRP Unknown ☐ PRP Performing Response Actions ☐ Check here if additional involved parties are listed on an RLFA.
☐ PRP Unwilling or Unable to Perform Response Actions. Who is? ☐ DEP ☒ Other Person Who: Town of Grafton Sewer Dept

Name of PRP Organization: Grafton Auto Body Shop

Name of PRP Contact: Floyd Danielson

Title: Owner

Street: 165 Worcester St.

☐ Check here if this PRP received a field NOR.

City/Town: Grafton

State: MA ZIP Code: 01560

Telephone: (508) 839-6052

Ext.: _____

FAX: _____

E. CONTRACTOR:

Contractor Name: CDM

Telephone: (617) 628-7939

Ext.: _____

Name of Contact: A

☐ Check here if this is a State Contractor.

F. LSP:

LSP Name: Bill Swanson

LSP Number: 6406

Telephone: (617) 628-7938

Ext.: _____

FAX: _____

G. MCP RESPONSE ACTIONS: (check any that apply)

☐ IRA Assessment Only ☐ IRA Oral Plan Approved* ☐ IRA Oral Plan Denied
☐ Oral RAM Plan Approved* ☐ Oral RAM Plan Denied ☒ Notice of Intent to Conduct a URAM

Date of Action, if different from Log Date: _____ * Provide details of approved plans on an RLFA.

☒ Check here if soil was removed from the site prior to notification. ☐ Check here if the soil was removed as part of an UST closure.

Quantity of soil previously removed and destination: _____

H. DEP ASSIGNMENT:

RNF Submittal Requested: ☒ No ☐ Yes From Who: _____

Provisions of 21E Explained: ☒ Yes ☐ No Why Not: _____

Prepared By: Paul A. Spagno

Regional Use: _____

Signature: Paul A. Spagno

Number of RLFA Pages Attached: _____

Staff Lead Assigned
(if different from Preparer):

☐ Check here if Release or TOR is unassigned.

Memorandum

To: FILE
From: PAUL SPANO *PS*
Date: 05/07/99
Re: RTN 2-12393; TOWN OF GRAFTON URAM NOTIFICATION.

The purpose of this memo is to explain why the Town of Grafton submitted a release Notification Form (RNF) and why the RNF was not entered into the database. The Town of Grafton conducted a Utility release Abatement Measure (URAM) in the road in front of 165 Worcester Road, Grafton. On September 8, 1998, the Town orally notified the Department of their intent to conduct a URAM. Subsequently, the property located at 165 Worcester Road was determined to be the source of the contamination in the soils under the road. Release Tracking Number (RTN) 2-12437 was assigned to 165 Worcester Road and the PRP accepted responsibility for the cleanup of the oil/gasoline release. The Town had previously notified as a PRP. However, the writer informed the Town that they are not the PRP for this release, they are another person performing a response action. As an attempt to clarify their respective status as another person conducting a response action and not a PRP, the Town provided the Department with several submittals. The RNF is one of those submittals. Although the Town submitted a RNF it is not a person required to submit a RNF for this release, therefore the RNF will not be entered into the database, however, it will be filed. Currently, the database properly reports the Town as another person conducting a URAM and not a PRP, therefore it is not necessary to change the database.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-103

RELEASE NOTIFICATION & NOTIFICATION RETRACTION
FORM

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart G)

Release Tracking
Number

2 - 12393

If assigned by DEP

A. RELEASE OR THREAT OF RELEASE LOCATION:

Street: Worcester Street

Location AId: In Roadway at #165

City/Town: Grafton

ZIP
Code:

B. THIS FORM IS BEING USED

(check
one)

☒ Submit a Release Notification (complete all sections of this form).

☐ Submit a Retraction of a Previously Reported Notification of a Release or Threat of Release (complete Sections A, B, E, F and G of this form). You MUST attach the supporting documentation required by 310 CMR 40.0335.

C. INFORMATION DESCRIBING THE RELEASE OR THREAT OF RELEASE (TOR):

Date and time you obtained knowledge of the Release or TOR. 09/08/99 Time: _____ Specify: ☐ AM ☐ PM

The date you obtained knowledge is always required. The time you obtained knowledge is not required if reporting only 120 Day Conditions.

IF KNOWN, record date and time release or TOR occurred. _____ Time: _____ Specify: ☐ AM ☐ PM

☒ Check here if you previously provided an Oral Notification to DEP (2 Hour and 72 Hour Reporting Conditions only).

Provide date and time of Oral Notification. 09/08/99 Time: _____ Specify: ☐ AM ☐ PM

Check all Notification Thresholds that apply to the Release or Threat of Release: (for more information see 310 CMR 40.0310 - 40.0315)

2 HOUR REPORTING CONDITIONS

72 HOUR REPORTING CONDITIONS

120 DAY REPORTING CONDITIONS

☐ Sudden Release

☐ Subsurface Non-Aqueous Phase Liquid (NAPL) Equal to or Greater than 1/2 Inch

☐ Release of Hazardous Material(s) to Soil or Groundwater Exceeding Reportable Concentration(s)

☐ Threat of Sudden Release

☐ Underground Storage Tank (UST) Release

☒ Release of Oil to Soil Exceeding Reportable Concentration(s) and Affecting More than 2 Cubic Yards

☐ Oil Sheen on Surface Water

☐ Threat of UST Release

☐ Release of Oil to Groundwater Exceeding Reportable Concentration(s)

☐ Poses Imminent Hazard

☐ Could Pose Imminent Hazard

☐ Release Detected in Private Well

☐ Release to Groundwater near Water Supply

☐ Subsurface Non-Aqueous Phase Liquid (NAPL) Equal to or Greater than 1/8 Inch and Less than 1/2 Inch

☐ Release to Storm Drain

☐ Release to Groundwater near School or Residence

☐ Sanitary Sewer Release (Imminent Hazard Only)

List below the Oils or Hazardous Materials that exceed their Reportable Concentration or Reportable Quantity by the greatest amount. If necessary, attach a list of additional Oil and Hazardous Material substances subject to reporting.

Name and Quantities of Oils (O) and Hazardous Materials (HM)
Released:

O or HM Released	O HM (check one)	CAS # (if known)	Amount or Concentration	Units	Reportable Concentrations Exceeded, if Applicable (RCS-1, RCS-2, RCGW-1, RCGW-2)
<u>C5-C8 Aliphatics (Gasoline)</u>	<input checked="" type="checkbox"/> <input type="checkbox"/>		<u>7.24</u>	<u>mg/kg</u>	<u>RCS-2</u>
<u>C9-C10 Aromatics (Gasoline)</u>	<input checked="" type="checkbox"/> <input type="checkbox"/>		<u>9.67</u>	<u>mg/kg</u>	<u>RCS-2</u>

D. ADDITIONAL INVOLVED PARTIES:

☐ Check here if attaching names and addresses of owners of properties affected by the Release or Threat of Release, other than an owner who is submitting this Release Notification (required).

☒ Check here if attaching Licensed Site Professional (LSP) name and address (optional).

You may write in names and addresses on the bottom of the second page of this form.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-103

Release Tracking
Number

2 - 12393

If assigned by DEP

RELEASE NOTIFICATION & NOTIFICATION RETRACTION
FORM

Pursuant to 310 CMR 40.0335 and 310 CMR 40.0371 (Subpart C)

E. PERSON REQUIRED TO NOTIFY:

Name of Organization: Town of Grafton
Name of Contact: Fred G. Haffty Title: Superintendent
Street: 9 Depot Road
City/Town: South Grafton State: MA ZIP Code: 01560-0000
Telephone: 508-839-8526 Ext.: _____ FAX: 508-839-8523
(optional)

F. RELATIONSHIP OF PERSON REQUIRED TO NOTIFY TO RELEASE OR THREAT OF RELEASE: (check one)

- ☐ RP or PRP Specify ☐ Owner ☐ Operator ☐ Generator ☐ Transporter Other RP or PRP: _____
☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
☒ Any Person Otherwise Required to Notify Specify Town of Grafton adjacent to property at 165 Worcester Street (RTN 2-12437)
Relationship: _____

G. CERTIFICATION OF PERSON REQUIRED TO NOTIFY:

I, Fred G. Haffty, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

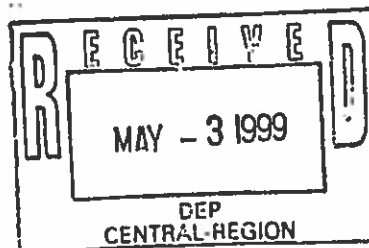
By: [Signature] Title: Superintendent
(signature)
For Town of Grafton Date: 2 APRIL 99
(print name of person or entity recorded in Section E)

Enter address of the person providing certification, if different from address recorded in Section E:

Street: _____
City/Town: _____ State: _____ ZIP Code: _____
Telephone: _____ Ext.: _____ FAX: _____
(optional)

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

William R. Swanson, P.E., LSP of Camp Dresser & McKee Inc., Ten Cambridge Center, Cambridge, Massachusetts 02142 is the LSP of record.





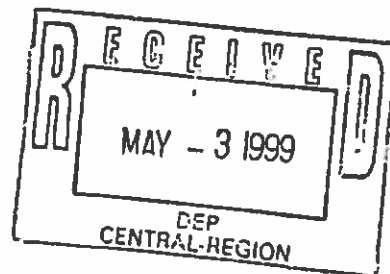
Camp Dresser & McKee Inc.

consulting
engineering
construction
operations

Ten Cambridge Center
Cambridge, Massachusetts 02142
Tel: 617 252-8000 Fax: 617 621-2565

March 29, 1999

Mr. Paul Spano
DEP Central Region
Bureau of Waste Site Cleanup
627 Main Street
Worcester, Massachusetts 01608



Subject: Town of Grafton
Worcester Street URAM
Release Notification Form (BWSC-103)

Dear Mr. Paul Spano:

As you requested, Camp Dresser & McKee Inc. (CDM) herewith submits a Release Notification Form (BWSC-103) for the Worcester Street URAM. Consistent with the revisions we recently made to the URAM Transmittal Form, we have listed the Town of Grafton as an abutter to the property at 165 Worcester Street (RTN 2-12437) instead of as the "responsible party."

If you have any questions, please contact either me or Jim Winkler at (617) 252-8000.

Very truly yours,

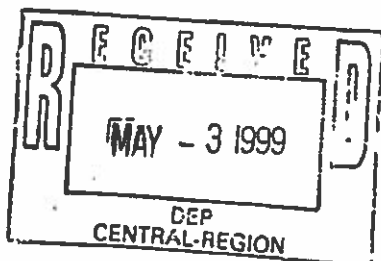
CAMP DRESSER & McKEE INC.

William R. Swanson, P.E., LSP
Vice President

TRANSMITTAL SHEET

environmental engineers, scientists,
planners & management consultants

CDM



Date March 29, 1999

Job Worcester St.

Sewer Main Project

To Town of Grafton

9 Depot street

South Grafton, MA 01560

Att. Mr. Fred Haffty

we are sending

herewith ☒

under separate cover ☐

by messenger ☐

1 print(s) each of the following Release Notification Form

which are

approved ☐

approved as noted ☐

returned to you for correction and resubmittal ☐

for your information. use ☒

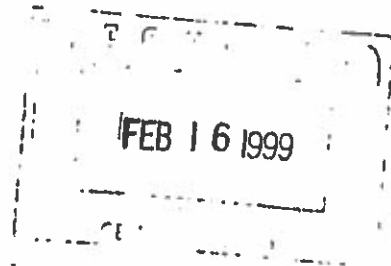
Please sign Section G of the form and then forward
original to DEP using the attached transmittal letter.

By Jim White

CDMconsulting
engineering
construction
operations**Camp Dresser & McKee Inc.**Ten Cambridge Center
Cambridge, Massachusetts 02142
Tel: 617 252-8000 Fax: 617 621-2565

2-12393

February 9, 1999

Mr. Paul Spano
DEP Central Region
Bureau of Waste Site Cleanup
627 Main Street
Worcester, Massachusetts 01608Subject: Town of Grafton
Worcester Street URAM Notification Submittal

Dear Mr. Paul Spano:

Camp Dresser & McKee Inc. (CDM) herewith submits an amended Page 4 of 4 of Form BWSC-106. Per your conversation with Jim Winkler, CDM has revised Section L of the form. The Town of Grafton is no longer listed as the "Responsible Party" but is instead now listed as an abutter to the property at 165 Worcester Street, Grafton (RTN 2-12437). Please amend the URAM Notification that was submitted in September 1998 with this revised page.

If you have any questions please call either me or Jim Winkler at (617)252-8845.

Very truly yours,

CAMP DRESSER & MCKEE INC.

William R. Swanson, P.E., LSP
Vice President



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-106

3-24-99

RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking

2 - 12393

L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or URAM: (check one)

- ☐ RP or PRP Specify: ☐ Owner ☐ Operator ☐ Generator ☐ Transporter Other RP or PRP: _____
- ☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☒ Any Other Person Undertaking RAM or URAM Specify Town of Grafton adj. to 165 Worcester St., Grafton MA

M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM:

I, Fred G. Haffty, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: [Signature] Title: Superintendent
(signature)

For: Town of Grafton Date: 16 Feb 99
(print name of person or entity recorded in Section K)

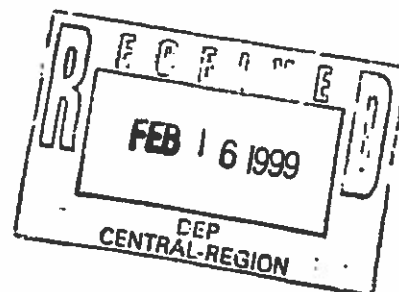
Enter address of person providing certification, if different from address recorded in Section

Street: _____

City/Town: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ FAX: (optional) _____

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.



MS
3-24-99

FRONT END/SITES DATABASE CHANGE FORM

(completed by BWSC staff)

RTN #/SITE ID #: 2-12393

Related #: 2-

RTN/SITE NAME OR ADDRESS: 165 Worcester St., Grafton

STAFF SUBMITTING CHANGE: Paul Spano

DATE: 3-24-99

AUTHORIZATION (Branch or Sect. Chief/RE): Paul Spano

REASONING FOR CHANGE (Not Optional):

Town of Grafton is not the PRP.

The Town is. An Other Person Undertaking a URAM

if email or RLFA, is there a copy attached? (Y or N)

CHANGE/ADD

FIELD

FROM

TO

Affiliation

Town of Grafton PRP → Town of Grafton

as Other Person Conducting
a URAM

FEES for transition sites (must attach copy of email)

TYPE

Date cleared by Boston

SITE ID #

cc file

revised 7/18/95

P:\VDAQST\MP\CHNGFRN.MP



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-101

RELEASE LOG FORM

9-9-98

Release Tracking Number

2 - 12393

C. RELEASE OR THREAT OF RELEASE (TOR) INFORMATION: (continued)

Type of Release or TOR (check all that apply): ☐ Leak ☐ Spill ☐ Rupture ☐ Dumping ☐ Tank Removal ☐ Overfill

☐ Vehicle Accident ☐ Test Failure ☐ Fire ☐ Threat Only ☒ Unknown ☐ Other Specify: _____

Identify Media and Receptors Affected: (check all that apply) ☐ Air ☐ Groundwater ☐ Surface Water ☐ Sediments ☒ Soil

☐ Wetlands ☐ Storm Drain ☐ Paved Surface ☐ Private Well ☐ Public Water Supply ☐ Zone 2 ☐ Residence

☐ School ☐ Unknown ☐ Other Specify: _____

O or HM Released (check one) CAS # (if known) Amount or Conc. Units RCs Exceeded?
Gasoline ☒ O ☐ HM > RCs RCs-1
☐ O ☐ HM

Description of Release or Threat of Release:

* Digging for new sewer line installation, backhoe operator ceased operations because he thought he noticed some "flashing or popping" in the trench. A slight odor of gasoline was noticed in the soil. Fire Dept. called to notify of URAM. The writer requested that the Town have an LSP evaluate for IRA conditions prior to continuation of any soil removal. Chief Guilmette stated he would have an LSP from CDM evaluate site conditions.

D. PRP INFORMATION:

☐ PRP Unknown ☒ PRP Performing Response Actions ☐ Check here if additional involved parties are listed on an RLFA.
☐ PRP Unwilling or Unable to Perform Response Actions. Who is? ☐ DEP ☐ Other Person Who: _____

Name of PRP Organization: Town of Grafton

Name of PRP Contact: Fred Haffty

Title: Superintendent, Sewer Dept.

Street: 165 W. 30 Providence Rd.

☐ Check here if this PRP received a field NOR.

City/Town: Grafton

State: MA ZIP Code: 01519

Telephone: (508) 839-5335

Ext.: _____

FAX: _____

E. CONTRACTOR:

Contractor Name: CDM

Telephone: (617) 252-8845 Ext.: _____

Name of Contact: Jim Winkler

☐ Check here if this is a State Contractor.

F. LSP:

LSP Name: Bill Swanson

LSP Number: _____

Telephone: _____

Ext.: _____

FAX: _____

G. MCP RESPONSE ACTIONS: (check any that apply)

☐ IRA Assessment Only ☐ IRA Oral Plan Approved* ☐ IRA Oral Plan Denied
☐ Oral RAM Plan Approved* ☐ Oral RAM Plan Denied ☒ Notice of Intent to Conduct a URAM

Date of Action, if different from Log Date: _____ * Provide details of approved plans on an RLFA.

☐ Check here if soil was removed from the site prior to notification. ☐ Check here if the soil was removed as part of an UST closure.

Quantity of soil previously removed and destination: _____

H. DEP ASSIGNMENT:

RNF Submittal Requested: ☒ No ☐ Yes From Who: _____

Provisions of 21E Explained: ☒ Yes ☐ No Why Not: _____

Prepared By: Paul H. Spagno

Regional Use: *DR*

Signature: *Paul H. Spagno*

Number of RLFA Pages Attached: _____

Staff Lead Assigned
(if different from Preparer):

☐ Check here if Release or TOR is unassigned.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-101

RELEASE LOG FORM

Release Tracking Number

2-12393

A. LOG INFORMATION:

Log Date:

9-8-98

Log Time:

4:40

Check one:

☐ AM ☒ PM

Use of Form:
(check one)

☒ Initial Office
☐ Boston
☐ Amended

TYPE OF CALL (check one):

☒ Release or TOR
☐ Complaint ☐ Inquiry

CALLER (check one):

☐ PRP
☒ Public Safety Official
☐ Other Government Agency
☐ Citizen
☐ Anonymous
☐ LSP or PRP Agent
☐ Other Person: _____

DISPOSITION OF CALL (check the one most applicable disposition below):

If selecting one of the two following options, assign a Release Tracking Number (RTN) in the space provided above:

☒ Reportable Release or Threat of Release
☐ Release or Threat of Release Less Than Reporting Threshold

Select one of the two following options only if an RTN was previously assigned:

☐ Release Notification Retraction (with BWSC-103 only)
☐ Not a 21E Release

If selecting any option below, do not assign an RTN:

☐ Release or Threat of Release Exempt from Reporting Requirements (not referred)
☐ Report Referred to Other Agency or Division
Referred To: _____
☐ No Action Taken

Reporting Person: Ray Guilmette

Telephone: (508) 839-4606 Ext.: _____

Organization: Grafton F.D.

B. RELEASE OR THREAT OF RELEASE LOCATION:

Street: 165 Worcester Street

Location Aid: Grafton Foreign Motors

City/Town: Grafton

Adequately Regulated Status: _____

Fee Status: _____

Type of Location (check all that apply): ☐ Commercial ☐ Industrial ☐ Residential ☐ School ☐ Municipal ☐ State
☐ Federal ☐ Right of Way ☒ Roadway ☐ Water Body ☐ Open Space Other: _____

Release Tracking Number of Associated Transition or Tier Classified Site, if any: _____

C. RELEASE OR THREAT OF RELEASE (TOR) INFORMATION:

Notification Date, if different from log date: _____

"One Year" Status Date, if not one year after notification date: _____

Date and time reporting person obtained knowledge of the Release or TOR. Date: 9-8-98 Time: 2:30 ☐ AM ☒ PM

IF KNOWN, record date and time Release or TOR occurred. Date: _____ Time: _____ ☐ AM ☐ PM

Check all conditions that apply to the Release or Threat of Release:

2 HOUR REPORTING CONDITIONS

☐ Sudden Release
☐ Threat of Sudden Release
☐ Oil Sheen on Surface Water
☐ Poses Imminent Hazard
☐ Could Pose Imminent Hazard
☐ Release Detected in Private Well
☐ Release to Storm Drain
☐ Sanitary Sewer Release (Imminent Hazard Only)

72 HOUR REPORTING CONDITIONS

☐ Subsurface NAPL = or > 1/2 Inch
☐ UST Release
☐ Threat of UST Release
☐ Release to Groundwater near Water Supply
☐ Release to Groundwater near School or Residence

120 DAY REPORTING CONDITIONS

☐ Release of HM(s) to Soil or Groundwater > RC(s)
☒ Release of Oil to Soil > RC(s) and Affecting > 2 Cubic Yards
☐ Release of Oil to Groundwater > RC(s)
☐ Subsurface NAPL = or > 1/8 Inch and < 1/2 Inch
☐ Check here if Substantial Release Migration exists in connection with 120 Day Reporting Conditions

Source of Release or TOR (check all that apply): ☐ UST ☐ Pipe/Hose/Line ☐ AST ☐ Drums ☐ Transformer ☐ Boat

☐ Tanker Truck ☐ Vehicle ☒ Unknown ☐ Other Specify: _____

Federal LUST Eligible? ☐ Yes ☒ No ☐ Unknown

SECTION C IS CONTINUED ON THE NEXT PAGE.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-102B

RELEASE LOG FORM ATTACHMENT

MJ 9-9-98
Release Tracking Number
2-12393

E. LOG/RELEASE LOCATION INFORMATION: (complete if using only BWSC-102B)

City/Town: Grafton Date: 9-9-98 Time: 3:00 ☐ AM ☒ PM

Release Address: 165 Worcester St.

Use of Attachment (check one): ☐ Field ☒ Office Follow-up ☐ Attachment Page(s): _____ of: _____

F. ADDITIONAL DESCRIPTION:

Jim Winkler from CDM stated that soil samples were taken for analysis of EPH/VPH.

Headspace reading up to 150 ppm. Lab analysis will be 34-48 turnaround.

The writer informed Mr. Winkler that the Dept. requested the town conduct an assessment for the need to do an IRA. This request was based on information that gasoline may be causing "fishing & popping" in the trench. Mr. Winkler stated that CDM is conducting assessment for the need to conduct an IRA.

G. DEP ASSIGNMENT: (complete if using BWSC-102A and 102B or BWSC-102B only)

Preparer of RLFA (please print):

Paul A. Spauld

Signature:

Paul A. Spauld

Staff Lead Assigned (if different from preparer): _____

☐ Check here if the Release or Threat of Release is unassigned.

☐ Check here if this RLFA records a change in staff lead.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-102A

Release Tracking Number

RELEASE LOG FORM ATTACHMENT

-

A. LOG/RELEASE LOCATION INFORMATION: (complete if using BWSC-102A and 102B or BWSC-102A only)

City/Town: _____ Date: _____ Time: _____ ☐ AM ☐ PM

Release Address: _____

Use of Attachment (check one): ☐ Field ☐ Office Follow-up ☐ Attachment Page(s): _____ of: _____

B. ORAL PLAN SUMMARY: (check all that apply)

- | | |
|-------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------|
| <input type="checkbox"/> Removal of Contaminated Soils | <input type="checkbox"/> Deployment of Absorbent or Containment Materials |
| <input type="checkbox"/> Re-use or Recycling | <input type="checkbox"/> Temporary Covers or Caps |
| <input type="checkbox"/> On Site <input type="checkbox"/> Off Site Volume: _____ cubic yards | <input type="checkbox"/> Bioremediation |
| <input type="checkbox"/> Treat <input type="checkbox"/> On Site <input type="checkbox"/> Off Site Volume: _____ cubic yards | <input type="checkbox"/> Soil Vapor Extraction |
| Describe: _____ | <input type="checkbox"/> Structure Venting System |
| <input type="checkbox"/> Store <input type="checkbox"/> On Site <input type="checkbox"/> Off Site - Volume: _____ cubic yards | <input type="checkbox"/> Product or NAPL Recovery |
| <input type="checkbox"/> Landfill <input type="checkbox"/> Cover <input type="checkbox"/> Disposal Volume: _____ cubic yards | <input type="checkbox"/> Groundwater Treatment Systems |
| <input type="checkbox"/> Removal of Drums, Tanks or Containers | <input type="checkbox"/> Air Sparging |
| Describe: _____ | <input type="checkbox"/> Temporary Water Supplies |
| <input type="checkbox"/> Removal of Other Contaminated Media | <input type="checkbox"/> Temporary Evacuation or Relocation of Residents |
| Specify Type and Volume: _____ | <input type="checkbox"/> Fencing and Sign Posting |
| <input type="checkbox"/> Other Response Actions Describe: _____ | |

☐ Check here if this Release or Threat of Release is a candidate for future presumptive approval of an IRA or RAM Written Plan.

Check one of the following: ☐ Oral IRA Plan Approval ☐ Oral RAM Plan Approval ☐ Oral IRA Plan Modification Approval

Other Comments: _____

C. ADDITIONAL INVOLVED PERSON INFORMATION:

Check One: ☐ PRP ☐ PRP Local Contact ☐ Other Person Performing Response Action

☐ Other Relationship Specify: _____

Name of Organization: _____

Name of Contact: _____ Title: _____

Street: _____ ☐ Check here if this person received a field NOR.

City/Town: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ FAX: _____

D. DEP ASSIGNMENT: (complete if using only BWSC-102A)

Preparer of RLFA (please print): _____ Signature: _____

Staff Lead Assigned (if different from preparer): _____

☐ Check here if the Release or Threat of Release is unassigned.

☐ Check here if this RLFA records a change in staff lead.

165 WORCESTER ST
GRAFTON

2-0012393
GRAM

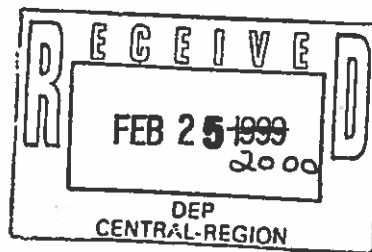
SCANNED



Town of Grafton
Board of Sewer Commissioners
Grafton Memorial Municipal Center
30 Providence Road
Grafton, Massachusetts 01519
508 839-4435

February 10, 2000

Department of Environmental Protection
Bureau of Waste Site Cleanup
205A Lowell Street
Wilmington, Ma. 01887



Subject: RTN 2 - 12437
Worcester Street, Grafton
URAM Completion Statement

Dear Sir or Madam:

In accordance with 310 CMR 40.0466, enclosed please find a URAM Completion Statement for the above referenced site.

If you have any questions, please contact Mr. James H. Winkler, Camp Dresser & McKee Inc., One Cambridge Place, 50 Hampshire Street, Cambridge, Massachusetts 02139 at (617) 452 - 6263.

Respectfully,

A handwritten signature in black ink, appearing to read "Fred G. Haffty".

Fred G. Haffty, Superintendent of Sewers



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

03/08/00
Release Tracking
Number

2 - 12393

A. SITE LOCATION:

Site Name:
(optional)

Street Worcester Street

Location Aid: in roadway at #165

City/Town: Grafton

ZIP 01519-0000

Code:

☐ Check here if a Tier Classification Submittal has been provided to DEP for this Release Tracking Number.

Related Release Tracking Numbers That This RAM or URAM
Addresses:

RTN 2-12437

B. THIS FORM IS BEING USED TO:

(check all that apply)

☐ Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M).

☐ Check here if this RAM Plan is an update or modification of a previously approved written RAM Plan.

Date Submitted: _____

☐ Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L and M).

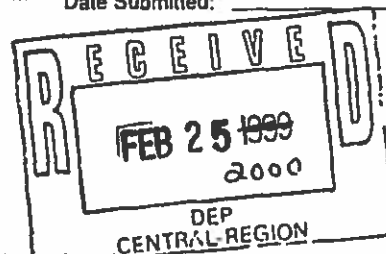
☐ Submit a RAM Completion Statement (complete Sections A, B, C, D, E, G, J, K, L and M).

☐ Confirm or Provide URAM Notification (complete Sections A, B, H, K, L and M).

☐ Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L and M).

☒ Submit a URAM Completion Statement (complete Sections A, B, C, D, E, I, J, K, L and M).

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.



C. SITE CONDITIONS:

☒ Check here if the source of the Release or Threat of Release is known.

If yes, check all sources that apply:

☒ UST

☐ Pipe/Hose/Line

☐ AST

☐ Drums

☐ Transformer

☐ Boat

☐ Tanker Truck

☐ Vehicle

☐ Other Specify: _____

Identify Media and Receptors Affected: (check all that apply)

☐ Air

☐ Groundwater

☐ Surface Water

☐ Sediments

☒ Soil

☐ Wetlands

☐ Storm Drain

☐ Paved Surface

☐ Private Well

☐ Public Water Supply

☐ Zone 2

☐ Residence

☐ School

☐ Unknown

☐ Other Specify: _____

Identify Release and/or Threat of Release Conditions at Site: (check all that apply)

☒ 2 and 72 Hour Reporting Condition(s)

☐ 120 Day Reporting Condition(s)

☐ Other Condition(s)

Describe UST release at 165 Worcester Street

RAMs may be conducted concurrently with an IRA only with written DEP approval
URAMs may not be conducted if any 2 or 72 Hour conditions exist at the site.

Identify Oils and Hazardous Materials Released: (check all that apply)

☒ Oils

☐ Chlorinated Solvents

☐ Heavy Metals

☐ Others Specify: _____

D. DESCRIPTION OF RESPONSE ACTIONS:

(check all that apply)

☐ Assessment and/or Monitoring Only

☒ Excavation of Contaminated Soils

☒ Re-use, Recycling or Treatment

☐ On Site

☒ Off Site

Est. Vol.: 40 cubic yards

Describe: _____

☐ Store

☐ On Site

☐ Off Site

Est. Vol.: _____ cubic yards

☐ Deployment of Absorbent or Containment Materials

☐ Temporary Covers or Caps

☐ Bioremediation

☐ Soil Vapor Extraction

☐ Structure Venting System

☐ Product or NAPL Recovery

SECTION D IS CONTINUED ON THE NEXT PAGE.



RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking
Number

2 - 123-93

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

D. DESCRIPTION OF RESPONSE ACTIONS (continued):

- ☐ Landfill ☐ Cover ☐ Disposal Est. Vol.: _____ cubic yards
- ☐ Removal of Drums, Tanks or Containers
- Describe: _____
- ☐ Removal of Other Contaminated Media
- Specify Type and Volume: _____
- ☐ Other Response Actions Describe: _____
- ☐ Groundwater Treatment Systems
- ☐ Air Sparging
- ☐ Temporary Water Supplies
- ☐ Temporary Evacuation or Relocation of Residents
- ☐ Fencing and Sign Posting
- See 310 CMR 40.0442 for limitations on the scope and type of RAMs.
See 310 CMR 40.0464 for performance standards for URAMs.
- ☐ Check here if this RAM or URAM involves the use of Innovative Technologies. DEP is interested in using this information to aid in creating an Innovative Technologies Clearinghouse.

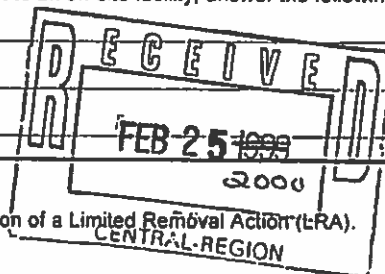
Describe
Technologies: _____

E. TRANSPORT OF REMEDIATION WASTE: (if Remediation Waste has been sent to an off-site facility, answer the following questions)

Name of Facility: AMREC

Town and State: Charlton, Massachusetts

Quantity of Remediation Waste Transported to Date: 6.0 tons



F. RAM PLAN:

- ☐ Check here if this RAM Plan received previous oral approval from DEP as a continuation of a Limited Removal Action (LRA).
Date of Oral Approval: _____
- ☐ If a RAM Compliance Fee is required, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. See 310 CMR 40.0444(2) to learn when a fee is not required.
- ☐ Check here if the RAM Plan is proposed for a Transition Site. If this is the case, you may need to attach an LSP Evaluation Opinion prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for further information about Transition Sites.

G. RAM COMPLETION STATEMENT:

- ☐ If a RAM Compliance Fee is required in connection with submission of the RAM Completion Statement, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. You owe this fee when submitting a RAM Completion Statement if you received oral approval of a RAM that continued an LRA, and have NOT previously submitted a RAM Plan and accompanying fee.
- If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement, you must submit a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the RAM Completion Statement.

H. URAM NOTIFICATION:

- Identify Location Type: (check all that apply) ☐ Public Right of Way ☐ Utility Easement ☐ Private Property
- Identify Utility Type: (check all that apply) ☐ Sanitary/Combined Sewerage ☐ Water ☐ Drainage ☐ Natural Gas
- ☐ Telephone ☐ Steam Lines ☐ Telecommunications ☐ Electric ☐ Other Specify: _____
- ☐ Check here if you provided DEP with previous oral notification of this URAM. Date of Oral Notice: _____
- ☐ Check here if the property owner was NOT contacted prior to initiation of the URAM. If this is the case, you must attach an explanation of why the owner was not contacted, including the date and time when contact ultimately occurred.
- ☐ Check here if this URAM will occur in connection with the construction of new public utilities. If this is the case, document the nature and extent of encountered contamination, the scope and expense of necessary mitigation and the benefits and limitations of project alternatives.

With the exception stated below, the person undertaking the URAM must provide the name and license number of an LSP engaged or employed in connection with the URAM:

LSP Name: _____ LSP License Number: _____

LSP information is not required if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by a Hazardous Material or a mixture of a Hazardous Material and Oil.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking
Number

2 - 12393

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

I. URAM COMPLETION STATEMENT:

☒ Check here if this URAM was limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement.

J. LSP OPINION:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> if Section B of this form indicates that a Release Abatement Measure Plan is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a Release Abatement Measure Status Report or a Utility-Related Abatement Measure Status Report is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> if Section B of this form indicates that a Release Abatement Measure Completion Statement or a Utility-Related Abatement Measure Completion Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

☐ Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

LSP Name: William R. Swanson LSP #: 6406 Stamp:

Telephone: 617-452-6274 Ext.:

FAX:
(optional)

Signature: *William R. Swanson*

Date: 2/7/00



An LSP Opinion is not required for a Utility-Related Abatement Measure Notification.

An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or a mixture of Hazardous Material and Oil.

K. PERSON UNDERTAKING RAM OR URAM:

Name of Organization: Town of Grafton

Name of Contact: Fred G. Haffty

Street: 9 Depot Street

City/Town: South Grafton

Telephone: 508-839-8526

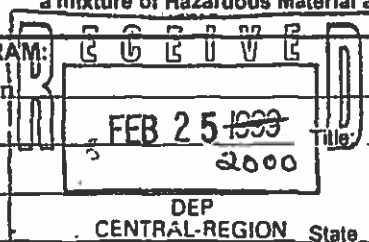
Ext.:

FAX:

(optional)

508-839-8523

☐ Check here if there has been a change in person undertaking the RAM or URAM.



Title: Superintendent



**RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking
Number

2 - 12393

L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or URAM: (check one)

- ☐ RP or PRP Specify ☐ Owner ☐ Operator ☐ Generator ☐ Transporter Other RP or PRP: _____
- ☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☒ Any Other Person Undertaking RAM or URAM Specify Relationship: _____

M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM:

I, _____, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: [Signature] Title: Superintendent
(signature)

For Town of Grafton Date: 9 Feb 00
(print name of person or entity recorded in Section K)

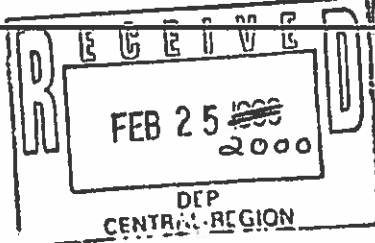
Enter address of person providing certification, if different from address recorded in Section K:

Street: _____

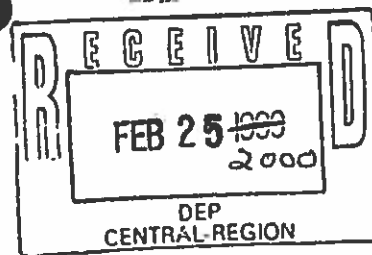
City/Town: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext. _____ FAX: _____
(optional)

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.



**Town of Grafton, Massachusetts
URAM Completion Statement
RTN 2-12437**



Introduction

This Utility-Related Abatement Measure (URAM) Completion Statement describes the remedial actions that were undertaken to address the presence of gasoline contamination in subsurface soil in Worcester Street, Grafton, Massachusetts, at #165 Worcester Street during the installation of a new sewer main. The location of the site on Worcester Street is shown in **Figure 1**. This URAM Completion Statement has been prepared in accordance with the requirements of Massachusetts Contingency Plan (310 CMR 40.0466).

Background

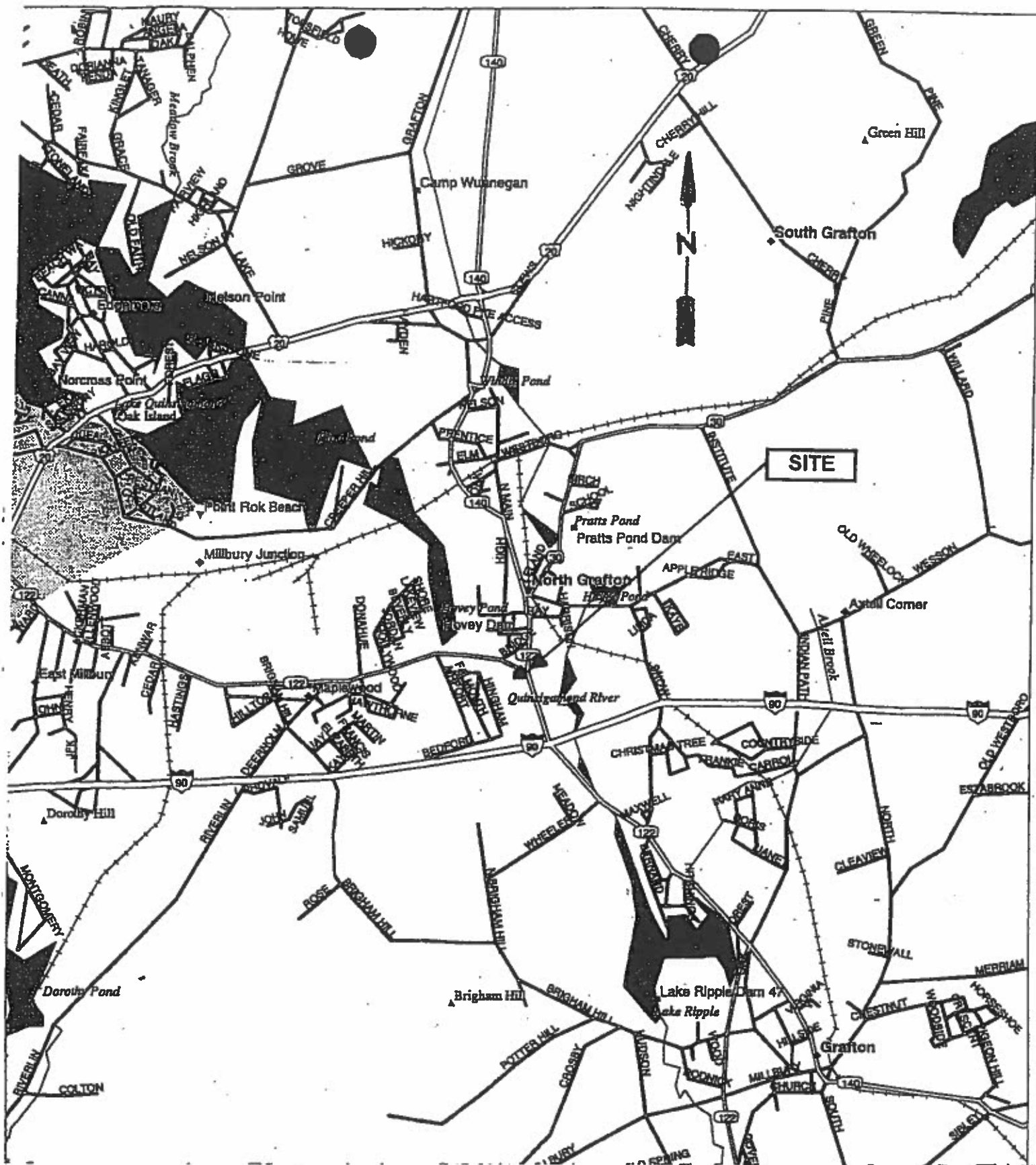
On September 8, 1998, as a General Contractor (A.F. Amorello & Sons, Inc.), under contract with the Town of Grafton, was installing a new 8-inch sewer main on Worcester Street, the presence of gasoline contaminated soil was identified in the excavation, approximately 8 feet below ground surface along the roadway at #165 Worcester Street. The contaminated soil area is shown in **Figure 2**. Work was immediately stopped and the Town of Grafton Fire Department was called to assess the situation. Upon inspection of the conditions, the Fire Chief, Mr. Raymond Guilmette contacted Mr. Paul Spano of the DEP Central Region to advise them on the situation. Mr. Spano instructed the Town of Grafton to hire a Licensed Site Professional. Steel plates were placed over the excavation.

According to the owner of #165 Worcester Street, there were three abandoned underground storage tanks in the driveway to the property immediately adjacent to the property line. The owner indicated that before he purchased the property, the former owner had operated a service station and that the tanks had been used for gasoline storage.

On September 9, 1998, the steel plates were removed to 1) evaluate if an imminent hazard condition existed and 2) assess the nature and extent of the release with respect to its potential impact on the sewer main installation project.

Camp Dresser & McKee Inc. (CDM), using an organic vapor monitor, monitored the air space immediately after the steel plates were removed from above the excavation. No detectable readings were measured by the instrument. In addition, there was no olfactory evidence of gasoline odors emanating from the excavation. On the previous day, the air space had been screened for explosive conditions and no detectable readings were measured with a Lower Explosive Level (LEL) monitoring device. Evaluation of the conditions indicated that an imminent hazard condition as defined under the MCP, 40.0321 did not exist.

CDM collected three soil samples at two locations for headspace testing and subsequent laboratory analysis if warranted. The first sample was collected in the excavation where work had been terminated at Station MH +195 feet, on the previous day. A sample (GRAF-01) was collected from the sidewall (towards #165 Worcester Street) of the excavation, approximately 8 feet below ground surface. The headspace reading from the sample was 153 ppm. The sample was submitted to CDM's Laboratory for VPH and EPH analysis. Results of this laboratory analysis, tabulated in Table 1, indicated no presence of elevated levels of hydrocarbons above the MCP RCS-2 limit.



Town of Grafton

Figure 1
 URAM Completion Statement
 RTN 2-12437
 Location Plan

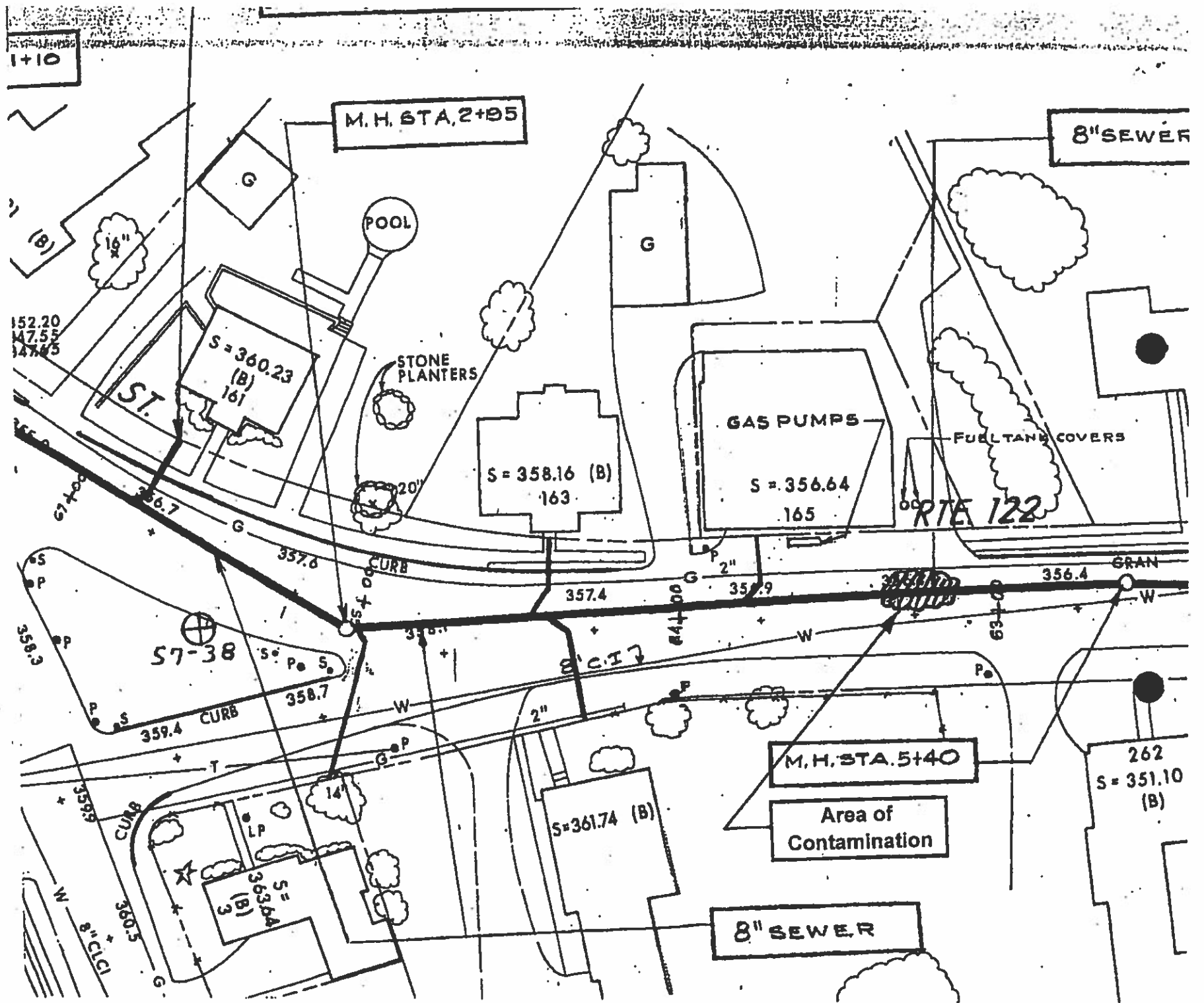


Figure 2
URAM Completion Statement
RTN 2-12437
Location Plan

Table 1
URAM Completion Statement
RTN 2-12437
Summary of Initial Sampling Results

Parameter	GRAF-01 9/8/98	MCP RCS-2 Limits
C5-C8 Aliphatics	15	500
C9-C12 Aliphatics	44	2500
C9-C10 Aromatics	75	500
Methyl-tert-butylether	ND	200
Benzene	ND	60
Toluene	ND	500
Ethylbenzene	0.18	500
m/p-Xylene	0.16	500
o-Xylene	0.15	500
Naphthalene	0.36	1000
C9-C18 Aliphatics	33	2500
C19-C36 Aliphatics	39	5000
C11-C22 Aromatics	61	2000
Naphthalene	ND	1000
2-Methylnaphthalene	1.1	1000
Phenanthrene	ND	100
Acenaphthene	ND	2500
Acenaphthylene	ND	1000
Fluorene	ND	1000
Anthracene	ND	2500
Fluoranthene	ND	2000
Pyrene	ND	2000
Benzo[a]anthracene	ND	1
Chrysene	ND	10
Benzo[b]fluoranthene	ND	1
Benzo[k]fluoranthene	ND	10
Benzo[a]pyrene	ND	0.7
Indeno[1,2,3-c,d]pyrene	ND	1
Dibenzo[a,h]anthracene	ND	0.7
Benzo[g,h,i]perylene	ND	2500

Notes:

All EPH/VPH data are reported with adjusted values.

Units - mg/kg

ND - Not Detected

The Second sample (GRAF-01A) was collected at the same location, but at approximately 4 feet below ground surface. The headspace reading from the sample indicated no detectable level. The third sample (GRAF-02) was collected 13 feet away at Station MH +208 feet. This sample was also collected in the sidewall of the excavation toward #165 Worcester Street at approximately 8 feet below ground surface. The headspace reading from the sample indicated no detectable level.

On March 29, 1999, a Release Notification Form (BWSC-103) for the Worcester Street URAM was submitted to DEP, Central Region. The Town of Grafton was listed as an abutter to the property at 165 Worcester Street (RTN 2-12437) instead of as the "responsible party." The URAM Notification, submitted to DEP on September 11, 1998, was revised accordingly.

URAM Documentation

Given the urban nature of the site, there was no convenient manner in which to relocate the sewer alignment. Therefore, the General Contractor, A.F. Amorello & Sons, Inc., performed the URAM with assistance from the Town of Grafton Fire Department. The Fire Department was on site during all activities.

Gasoline contaminated soil was excavated on September 13, 1998 and November 13, 1998, for the new sewer main on Worcester Street opposite #165 Worcester Street and for the service connection to #165 Worcester Street, respectively.

On September 13, 1998, clean overlying soil (above 7.5 feet) was segregated and stockpiled separately from contaminated soil as excavation proceeded during the installation of the new sewer main. Overlying soil was considered "clean" based on the absence of olfactory evidence of contamination. Approximately 10 cubic yards of contaminated soil was stored at the town yard during the mainline installation and subsequently moved to #165 Worcester Street.

On November 13, 1998, approximately 30 cubic yards of contaminated soil was excavated during the installation of the service connection. Three confirmatory soil samples (GRAF-03, GRAF-04, and GRAF-05) were collected from the service connection excavation at the property line of #165 Worcester Street. These post excavation soil samples were analyzed for VPH, and the results are tabulated in Table 2. Samples GRAF-03 and GRAF-05 showed elevated levels of C9-C10 Aromatic Hydrocarbons above the MCP RCS-2 limit, and an elevated level of C5-C8 Aliphatic Hydrocarbons was found in GRAF-03.

Per agreement with the owner of #165 Worcester Street and his LSP, EcoTec, Inc., 172 Lincoln Street, Worcester, Massachusetts, the excavated gasoline contaminated soil was disposed as part of the response action undertaken at #165 Worcester Street, relative to the removal of underground storage tanks. Approximately 40 cubic yards of soil from the excavation was stored in the rear of the property at #165 Worcester Street along with soil from the tank removals.

On August 2, 1999, three samples (Stockpile, SP-1, and SP-2) were collected from the stockpile located at #165 Worcester Street. One soil sample, Stockpile, was analyzed for TPH, PCBs, VOCs, and RCRA metals while the other soil samples, SP-1 and SP-2, were analyzed for TPH only. Results of the analysis indicated that the soil stockpile was suitable for in-state reuse or recycling. Tabulated results are presented in Table 3.

Table 2
URAM Completion Statement
RTN 2-12437
Summary of Post-Excavation Sampling Results

Parameter	GRAF-03 11/13/98	GRAF-04 11/13/98	GRAF-05 11/13/98	MCP RCS-2 Limits
C5-C8 Aliphatics	536	158	157	500
C9-C12 Aliphatics	1060	350	677	2500
C9-C10 Aromatics	967	338	698	500
Methyl-tert-butylether	ND	ND	ND	200
Benzene	ND	ND	ND	60
Toluene	ND	ND	ND	500
Ethylbenzene	18.6	ND	10.4	500
m/p-Xylene	126	33.0	58.3	500
o-Xylene	43.4	11.5	22.6	500
Naphthalene	ND	ND	8.68	1000

Notes:

All VPH data are reported with adjusted values.

Units - mg/kg

ND - Not Detected

Table 3
URAM Completion Statement
RTN 2-12437
Summary of Stockpile Sampling Results

<u>Parameter</u>	<u>Stockpile</u> <u>8/2/99</u>	<u>SP-1</u> <u>8/2/99</u>	<u>SP-2</u> <u>8/2/99</u>
TPH	174	498	671
Arsenic	9.5	NA	NA
Cadmium	5.54	NA	NA
Chromium	17.4	NA	NA
Lead	80.0	NA	NA
Mercury	0.05	NA	NA
Arochlor 1221	ND	NA	NA
Arochlor 1232	ND	NA	NA
Arochlor 1016/1242	ND	NA	NA
Arochlor 1248	ND	NA	NA
Arochlor 1254	ND	NA	NA
Arochlor 1260	0.128	NA	NA

Notes:

Units - mg/kg

ND - Not Detected

NA - Not Analyzed

Table 3 (Cont.)
URAM Completion Statement
RTN 2-12437
Summary of Stockpile Sampling Results

Parameter	Stockpile 8/2/99	SP-1 8/2/99	SP-2 8/2/99
Acetone	ND	NA	NA
Acrolein	ND	NA	NA
Acrylonitrile	ND	NA	NA
Benzene	ND	NA	NA
Bromoform	ND	NA	NA
Bromomethane	ND	NA	NA
2-Butanone (MEK)	1.06	NA	NA
Carbon Disulfide	ND	NA	NA
Carbon Tetrachloride	ND	NA	NA
Chlorobenzene	ND	NA	NA
Chloroethane	ND	NA	NA
2-Chloroethylvinylether	ND	NA	NA
Chloroform	ND	NA	NA
Chloromethane	ND	NA	NA
Dibromochloromethane	ND	NA	NA
1,2-Dichlorobenzene	ND	NA	NA
1,3-Dichlorobenzene	ND	NA	NA
1,4-Dichlorobenzene	ND	NA	NA
Bromodichloromethane	ND	NA	NA
1,1-Dichloroethane	ND	NA	NA
1,2-Dichloroethane	ND	NA	NA
1,1-Dichloroethene	ND	NA	NA
c-1,2-Dichloroethene	ND	NA	NA
t-1,2-Dichloroethene	ND	NA	NA
1,2-Dichloropropane	ND	NA	NA
c-1,3-Dichloropropene	ND	NA	NA
t-1,3-Dichloropropene	ND	NA	NA
Ethylbenzene	ND	NA	NA
2-Hexanone	ND	NA	NA
4-Methyl-2-pentanone (MIBK)	ND	NA	NA
Methylene Chloride	ND	NA	NA
Methyl tert-butyl ether	ND	NA	NA
Styrene	ND	NA	NA
1,1,2,2-Tetrachloroethane	ND	NA	NA
Tetrachloroethene	ND	NA	NA
Toluene	ND	NA	NA
1,1,1-Trichloroethane	ND	NA	NA
1,1,2-Trichloroethane	ND	NA	NA
Trichloroethene	ND	NA	NA
Trichlorofluoromethane	ND	NA	NA
Vinyl Chloride	ND	NA	NA
Xylenes	ND	NA	NA

Notes:

Units - mg/kg

ND - Not Detected

NA - Not Analyzed

On September 12, 1999, the soil was transported to AMREC in Charlton, MA. Transportation was performed by a common carrier, Zecco, Inc., under a DEP Bill of Lading. Weight slips indicated that a total of 375 tons of soil was transported off-site, of which approximately 60 tons was from the URAM. A copy of the MADEP Bill of Lading is provided in Appendix A.

On the basis of the above information and data, this URAM is considered to be complete.

**Town of Grafton
URAM Completion Statement
RTN 2-12437**

**Appendix A
Copy of MADEP Bill of Lading**


Massachusetts Department of Environmental Protection **BWSC-012A**
Bureau of Waste Site Cleanup

Release Tracking Number:

BILL OF LADING (pursuant to 310 CMR 40.0030)

2-12437

A. LOCATION OF SITE OR DISPOSAL SITE WHERE REMEDIATION WASTE WAS GENERATED:

Release Name (optional): Grafton Auto
 Street: 165 Worcester Road Location Aid: _____
 City/Town: Grafton Zip Code: 01526
 Date/Period of Generation: 1/1/1999 to 1/1/1999
 Additional Release Tracking Numbers Associated with this Bill of Lading: _____

*Note: If this Bill of Lading is the result of a Limited Removal Action (LRA) taken prior to Notification, a Release Tracking Number is not needed.

B. PERSON CONDUCTING RESPONSE ACTION ASSOCIATED WITH BILL OF LADING:

Name of Organization: MA-DEP-ER Title: _____
 Name of Contact: Bob Denne
 Street: 622 Main St
 City/Town: Worcester State: MA Zip Code: 01605
 Telephone: 508-792-1653 Ex. 5013

C. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON CONDUCTING RESPONSE ACTION ASSOCIATED WITH BILL OF LADING:

(check one/specify)

- ☐ RP Specify (circle one): Owner Operator Generator Transporter Other RP: _____
☐ PRP Specify (circle one): Owner Operator Generator Transporter Other PRP: _____
☐ Fiduciary/Secured Lender
☐ Agency/Public Utility on a Right of Way
☒ Other Person: MA-DEP-ER Branch

If an owner and/or operator is not conducting the response action associated with the Bill of Lading, provide on an attachment the name, contact person, address and telephone number, including any area code and extension, for each, if known.

D. TRANSPORTER/COMMON CARRIER INFORMATION:

Transporter/Common Carrier Name: Zeeco Title: General Manager
 Contact Person: Mark Noack
 Street: 745 West Main Street
 City/Town: Northboro State: MA Zip Code: 01532
 Telephone: 508-393-2537 Ex. _____

E. RECEIVING FACILITY/TEMPORARY STORAGE LOCATION:

Operator/Facility Name: AMREC Title: _____
 Contact Person: B. McEgan Bridge
 Street: 130 Sturbridge Rd
 City/Town: Charlton State: MA Zip Code: 01507
 Telephone: 508-248-3777 Ex. _____

Type of Facility: (check one)
☒ Asphalt Batch/Cold Mix ☐ Landfill/Disposal ☐ Incinerator
☐ Asphalt Batch/Hot Mix ☐ Landfill/Daily Cover ☐ Temporary Storage
☐ Thermal Processing ☐ Landfill/Structural Fill ☐ Other: _____

Division of Hazardous Waste/Class A Permit #: 100200 Division of Solid Waste Management Permit #: _____ EPA Identification #: MA0762201055

Actual/Anticipated Period of Temporary Storage (specify dates if applicable): _____ to _____

Reason for Temporary Storage (if applicable): _____



Massachusetts Department of Environmental Protection **BWSC-012A**

Bureau of Waste Site Cleanup

Release Tracking Number:

2-12437

BILL OF LADING (pursuant to 310 CMR 40.0030)**E. RECEIVING FACILITY/TEMPORARY STORAGE LOCATION (continued):**

Temporary Storage Address:

Street: _____

City/Town: _____

State: _____

Zip Code: _____

F. DESCRIPTION OF REMEDIATION WASTE:

(check all that apply)

☒ Contaminated Media (circle all that apply): Soil Groundwater Surface Water Other: _____☐ Contaminated Debris (circle all that apply): Demolition/Construction Waste Vegetation/Organic Materials

Inorganic Absorbent Materials Other: _____

☐ Non-hazardous Uncontainerized Waste (circle all that apply): Non-aqueous Phase Liquid Other: _____☐ Non-hazardous Containerized Waste (circle all that apply): Tank Bottoms/Sludges Containers Drums

Engineered Impoundments Other: _____

Type of Contamination (circle all that apply): Gasoline Diesel Fuel #2 Oil #4 Oil #6 Oil Waste Oil

Kerosene Jet Fuel Other: _____

Estimated Volume of Materials: Cubic Yards 256 Tons: 375 Other: _____Contaminant Source (check one/specify): ☐ Transportation Accident ☒ Underground Storage Tank ☐ Other: _____

Response Action Associated with Bill of Lading (circle one):

Immediate Response Action

Release Abatement Measure

Utility-Related Abatement Measure

Limited Removal Action (LRA)

Comprehensive Response Action

Other (specify): _____

Remediation Waste Characterization Support Documentation attached:

☒ Site History Information ☐ Sampling and Analytical Methods and Procedures ☒ Laboratory Data ☐ Field Screening Data

If supporting documentation is not appended, provide an attachment stating the date and in connection with what document such information was previously submitted to DEP.

G. LICENSED SITE PROFESSIONAL (LSP) OPINION:Name of Organization: DEP - Emergency ResponseLSP Name: Nicholas J. ChildTitle: Emergency Response Branch Chief

Telephone: _____ Ext. _____

I have personally examined and am familiar with the information contained on and submitted with this form. Based on this information, it is my opinion that the testing and assessment actions undertaken were adequate to characterize the Remediation Waste, in accordance with 310 CMR 40.0030, and that the facility or location can accept remediation wastes with the characteristics described in this submittal. I am aware that significant penalties including, but not limited to, possible fines and imprisonment may result if I willfully submit information which I know to be false, inaccurate, or materially incomplete.

Signature: _____

Seal:

Date: 1/1/00

License Number: _____

DEP-ER

H. CERTIFICATION OF PERSON CONDUCTING RESPONSE ACTION ASSOCIATED WITH THIS BILL OF LADING:

I certify under penalties of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

Signature: Nicholas J. ChildDate: 8/10/99Name of Person (print): Nicholas J. Child DEP-ER-BWSC


Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-012B

BILL OF LADING (pursuant to 310 CMR 40.0030)
LOG SHEET OF

Release Tracking Number:

2-12437

I. LOAD INFORMATION:**LOAD 1:** Signature of Transporter Representative:

Date of Shipment: 1/12/99 Time of Shipment: 8:30 (circle one) am/pm
 Truck/Tractor Registration: 39746 Trailer Registration (if any): 25953 MA

Receiving Facility/Temporary Storage Representative:

Date of Receipt: 1/12/99 Time of Receipt: 8:30
 (circle one) am/pm

Load Size (cu. yds./tons):

LOAD 2: Signature of Transporter Representative:

Date of Shipment: 1/12/99 Time of Shipment: 8:30 (circle one) am/pm
 Truck/Tractor Registration: 39746 Trailer Registration (if any): 25953 MA

Receiving Facility/Temporary Storage Representative:

Date of Receipt: 1/12/99 Time of Receipt: 8:30
 (circle one) am/pm

Load Size (cu. yds./tons):

LOAD 3: Signature of Transporter Representative:

Date of Shipment: 1/12/99 Time of Shipment: 8:30 (circle one) am/pm
 Truck/Tractor Registration: 39746 Trailer Registration (if any): 25953 MA

Receiving Facility/Temporary Storage Representative:

Date of Receipt: 1/12/99 Time of Receipt: 8:30
 (circle one) am/pm

Load Size (cu. yds./tons):

LOAD 4: Signature of Transporter Representative:

Date of Shipment: 1/12/99 Time of Shipment: 8:30 (circle one) am/pm
 Truck/Tractor Registration: 39746 Trailer Registration (if any): 25953 MA

Receiving Facility/Temporary Storage Representative:

Date of Receipt: 1/12/99 Time of Receipt: 8:30
 (circle one) am/pm

Load Size (cu. yds./tons):

LOAD 5: Signature of Transporter Representative:

Date of Shipment: 1/12/99 Time of Shipment: 8:30 (circle one) am/pm
 Truck/Tractor Registration: 39746 Trailer Registration (if any): 25953 MA

Receiving Facility/Temporary Storage Representative:

Date of Receipt: 1/12/99 Time of Receipt: 8:30
 (circle one) am/pm

Load Size (cu. yds./tons):

LOAD 6: Signature of Transporter Representative:

Date of Shipment: 1/12/99 Time of Shipment: 8:30 (circle one) am/pm
 Truck/Tractor Registration: 39746 Trailer Registration (if any): 25953 MA

Receiving Facility/Temporary Storage Representative:

Date of Receipt: 1/12/99 Time of Receipt: 8:30
 (circle one) am/pm

Load Size (cu. yds./tons):

LOAD 7: Signature of Transporter Representative:

Date of Shipment: 1/12/99 Time of Shipment: 8:30 (circle one) am/pm
 Truck/Tractor Registration: 39746 Trailer Registration (if any): 25953 MA

Receiving Facility/Temporary Storage Representative:

Date of Receipt: 1/12/99 Time of Receipt: 8:30
 (circle one) am/pm

Load Size (cu. yds./tons):

J. LOG SHEET VOLUME INFORMATION:

Total Volume This Page (cu.yds./tons):

Total Carried Forward (cu.yds./tons):

Total Carried Forward and This Page (cu.yds./tons):



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-012C

BILL OF LADING (pursuant to 310 CMR 40.0030)
SUMMARY SHEET

Release Tracking Number:

2 - **12437**

**L. ACKNOWLEDGEMENT OF RECEIPT OF REMEDIATION WASTE AT RECEIVING FACILITY OR
TEMPORARY STORAGE LOCATION:**

Receiving Facility/Temporary

Location Representative (print): _____

Title: _____

Signature: _____

Date: ____/____/____

**M. ACKNOWLEDGEMENT OF SHIPMENT AND RECEIPT OF REMEDIATION WASTE BY PERSON
CONDUCTING RESPONSE ACTION ASSOCIATED WITH THIS BILL OF LADING:**

I certify under penalties of law that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certification, and that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained herein is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for wilfully submitting false, inaccurate, or incomplete information.

Signature: _____

Date: ____/____/____

Name of Person (print): _____

GeoLabs, Inc.
Environmental Laboratories

PREPARED FOR:

Zacco, Inc.
345 West Main Street
Northboro, MA 01532

Attn: David Cunliffe

PROJECT ID:

Grafton Auto
Grafton

GEOLABS CERTIFICATION #:

MA-015

SAMPLE NUMBER:

84164-84166


DATE PREPARED:

August 6, 1999

PREPARED BY:

Christine Johnson

APPROVED BY:

 8-6-99
Jim Chen, Laboratory Director/Date

GeoLabs, Inc.
Environmental Laboratories

CLIENT NAME: ZECCO
SAMPLE TYPE: SOIL
COLLECTION DATE: 08/02/99
REC'D BY LAB: 08/03/99
COLLECTED BY: CLIENT

PROJECT ID: GRAFTON AUTO
REPORT DATE: 08/06/99
ANALYZED BY: DW 08/04/99
EXTRACTION DATE: 08/03/99
DIGESTION DATE: N/A

TOTAL PETROLEUM HYDROCARBONS

SAMPLE NUMBER	SAMPLE LOCATION	TPH (mg/Kg)	DETECTION LIMIT (mg/Kg)
------------------	--------------------	----------------	----------------------------

84164	STOCKPILE	174	7.0
84165	SP-1	498	7.0
84168	SP-2	671	70.0

ND = NOT DETECTED

Method Reference:

EPA Method 8100 (1) Modified

1) U.S. EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846,
1986, 3rd Edition.

GeoLabs, Inc.
Environmental Laboratories

CLIENT NAME: ZEGCO
SAMPLE TYPE: SOIL
COLLECTION DATE: 08/02/99
REC'D BY LAB: 08/03/99
COLLECTED BY: CLIENT

PROJECT ID: GRAFTON AUTO
REPORT DATE: 08/06/99
ANALYZED BY: SRW 08/06/99
EXTRACTION DATE: 08/03/99
DIGESTION DATE: N/A

POLYCHLORINATED BIPHENYLS

SAMPLE NUMBER: 84164
SAMPLE LOCATION: STOCKPILE

	RESULTS ($\mu\text{g/Kg}$)	DETECTION LIMIT ($\mu\text{g/Kg}$)
Arochlor 1221	ND	10.0
Arochlor 1232	ND	10.0
Arochlor 1016/1242	ND	10.0
Arochlor 1248	ND	10.0
Arochlor 1254	ND	10.0
Arochlor 1260	128	10.0

ND = NOT DETECTED

Method Reference:

EPA Method 8080 (1, 2)

- 1) Code of Federal Regulations 40 CFR, Parts 100-149, 1993.
- 2) U.S. EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, 1986, 3rd Edition.

GeoLabs, Inc.
Environmental Laboratories

CLIENT NAME:	ZECCO	PROJECT ID:	GRAFTON AUTO
SAMPLE TYPE:	SOIL	REPORT DATE:	08/06/99
COLLECTION DATE:	08/02/99	ANALYZED BY:	MP 08/05/99
REC'D BY LAB:	08/03/99	EXTRACTION DATE:	N/A
COLLECTED BY:	CLIENT	DIGESTION DATE:	N/A
PRESERVATIVE:	METHANOL		

VOLATILE ORGANICS

SAMPLE NUMBER: 84164
SAMPLE LOCATION: STOCKPILE

	RESULTS (µg/Kg)	DETECTION LIMIT (µg/Kg)
Acetone	ND	1000
Acrolein	ND	1000
Acrylonitrile	ND	1000
Benzene	ND	100
Bromoform	ND	100
Bromomethane	ND	100
2-Butanone (MEK)	1060	200
Carbon Disulfide	ND	100
Carbon Tetrachloride	ND	100
Chlorobenzene	ND	100
Chloroethane	ND	100
2-Chloroethylvinylether	ND	100
Chloroform	ND	100
Chloromethane	ND	100
Dibromochloromethane	ND	100
1,2-Dichlorobenzene	ND	100
1,3-Dichlorobenzene	ND	100
1,4-Dichlorobenzene	ND	100
Bromedichloromethane	ND	100
1,1-Dichloroethane	ND	100
1,2-Dichloroethane	ND	20.0
1,1-Dichloroethene	ND	100
c-1,2-Dichloroethene	ND	100
t-1,2-Dichloroethene	ND	100

GeoLabs, Inc.
Environmental Laboratories

CLIENT NAME: ZECCO
SAMPLE TYPE: SOIL
COLLECTION DATE: 08/02/99
REC'D BY LAB: 08/03/99
COLLECTED BY: CLIENT
PRESERVATIVE: METHANOL

PROJECT ID: GRAFTON AUTO
REPORT DATE: 08/08/99
ANALYZED BY: MP 08/05/99
EXTRACTION DATE: N/A
DIGESTION DATE: N/A

VOLATILE ORGANICS

SAMPLE NUMBER: 84164
SAMPLE LOCATION: STOCKPILE

	RESULTS (µg/Kg)	DETECTION LIMIT (µg/Kg)
1,2-Dichloropropane	ND	100
c-1,3-Dichloropropene	ND	11.8
t-1,3-Dichloropropene	ND	100
Ethylbenzene	ND	100
2-Hexanone	ND	100
4-Methyl-2-pentanone (MIBK)	ND	100
Methylene Chloride	ND	100
Methyl tert-butyl ether	ND	100
Styrene	ND	100
1,1,2,2-Tetrachloroethane	ND	38.5
Tetrachloroethene	ND	100
Toluene	ND	100
1,1,1-Trichloroethane	ND	100
1,1,2-Trichloroethane	ND	100
Trichloroethene	ND	100
Trichlorofluoromethane	ND	100
Vinyl Chloride	ND	40.0
Xylenes	ND	100

ND = NOT DETECTED

Method Reference:

EPA Method

8240 (1) GC/MS

5035 Collection Method

1) U.S. EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846, 1986, 3rd Edition.

GeoLabs, Inc.
Environmental Laboratories

CLIENT NAME: ZEGCO
SAMPLE TYPE: SOIL
COLLECTION DATE: 08/02/99
REC'D BY LAB: 08/03/99
COLLECTED BY: CLIENT

PROJECT ID: GRAFTON AUTO
REPORT DATE: 08/08/99
ANALYZED BY: LN 08/04/99
EXTRACTION DATE: N/A
DIGESTION DATE: SEE BELOW

TOTAL RCRA METALS

SAMPLE NUMBER: 84184
SAMPLE LOCATION: STOCKPILE

	RESULTS (mg/Kg)	DETECTION LIMIT (mg/Kg)	ANALYSIS DATE
ARSENIC	9.60	1.65	08/03/99
CADMIUM	9.54	0.231	08/03/99
CHROMIUM	17.4	1.98	08/03/99
LEAD	80.0	0.99	08/03/99
MERCURY	0.05	0.02	08/04/99

ND = NOT DETECTED

Method Reference:

EPA Method 3050A (1) Metal Preparation
EPA Method 6010A (1) Inductively Coupled Plasma
EPA Method 7471 (1) Manual Cold Vapor (Mercury)

1) U.S. EPA Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, SW-846,
1986, 3rd Edition.

GeoLabs, Inc.
Environmental Laboratories

CLIENT NAME: ZECOO
SAMPLE TYPE: SOIL
COLLECTION DATE: 08/02/99
REC'D BY LAB: 08/03/99
COLLECTED BY: CLIENT

PROJECT ID: GRAFTON AUTO
REPORT DATE: 08/06/99
ANALYZED BY: SEE BELOW
EXTRACTION DATE: N/A
DIGESTION DATE: N/A

pH/FLASHPOINT/REACTIVITY

SAMPLE NUMBER: 84164
SAMPLE LOCATION: STOCKPILE

PARAMETER	RESULTS	DETECTION LIMIT	ANALYZED BY
pH, S.U.	5.0	N/A	KAB 08/04/99
FLASHPOINT, ° C	>93	20° C	AS 08/03/99
REACTIVITY (mg/Kg):			
CYANIDE	ND	5.00	KAB 08/04/99
SULFIDE	ND	0.312	KAB 08/04/99

ND = NOT DETECTED
Method Reference:

EPA Method	1010 (1)	Pensky Martin Closed Cup
EPA Method	9045 (1)	Electrometric
EPA Method	7.3.3.2 (1)	Cyanide
EPA Method	7.3.4.2 (1)	Sulfide

GEOLABS, INC.
10 PLAIN STREET
BRAINTREE, MA 02184
MA-015

LIMITATIONS & EXCLUSIONS

All the professional opinions presented in this report are based solely on the scope of work conducted and sources referred to in our report. The data presented by Geolabs in this report was collected and analyzed using generally accepted industry methods and practices at the time the report was generated. This report represents the conditions, locations and materials that were observed at the time the work was conducted. No inferences regarding other conditions, locations or materials, at a later or earlier time may be made based on the contents of the report. No other warranty, express or implied is made.

This report was prepared for the sole use of our client. Portions of the report may not be used independent of the entire report.

All analyses were performed within required holding times, in accordance with EPA protocols and using accepted QA/QC procedures. The information contained in this report is, to the best of my knowledge, accurate and complete.

RECEIVED TIMEVZ FEB. 3. 11:32AM



Town of Grafton
Board of Sewer Commissioners
Grafton Memorial Municipal Center
30 Providence Road
Grafton, Massachusetts 01519
508 839-4435

February 10, 2000

Department of Environmental Protection
Bureau of Waste Site Cleanup
205A Lowell Street
Wilmington, Ma. 01887

Subject: RTN 2 - 12437
Worcester Street, Grafton
URAM Completion Statement

Dear Sir or Madam:

In accordance with 310 CMR 40.0466, enclosed please find a URAM Completion Statement for the above referenced site.

If you have any questions, please contact Mr. James H. Winkler, Camp Dresser & McKee Inc., One Cambridge Place, 50 Hampshire Street, Cambridge, Massachusetts 02139 at (617) 452 - 6263.

Respectfully,

A handwritten signature in black ink, appearing to read "Fred G. Haffty", is written over a horizontal line.

Fred G. Haffty, Superintendent of Sewers



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0482 - 0465 (Subpart D)

plus
2-2-98

Release Tracking

2 - 12393

A. SITE LOCATION:

Site Name: _____

Street: Worcester Street

Location Aid: in roadway at #165

City/Town: Grafton

ZIP: 01519-0000

☐ Check here if a Tier Classification Submittal has been provided to DEP for this Release Tracking Number.

Related Release Tracking Numbers That This RAM or URAM _____

B. THIS FORM IS BEING USED TO: (check all that apply)

☐ Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M).

☐ Check here if this RAM Plan is an update or modification of a previously approved written HAM Plan.

Date Submitted: _____

☐ Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L and M).

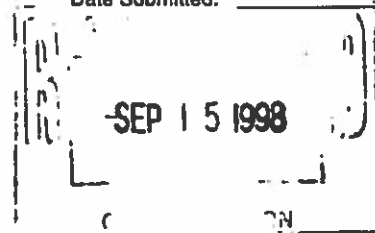
☐ Submit a RAM Completion Statement (complete Sections A, B, C, D, E, G, J, K, L and M).

☒ Confirm or Provide URAM Notification (complete Sections A, B, H, K, L and M).

☐ Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L and M).

☐ Submit a URAM Completion Statement (complete Sections A, B, C, D, E, I, J, K, L and M).

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.



C. SITE CONDITIONS:

☐ Check here if the source of the Release or Threat of Release is known.

If yes, check all sources that apply: ☐ UST ☐ Pipe/Hose/Line ☐ AST ☐ Drums ☐ Transformer ☐ Boat

☐ Tanker Truck ☐ Vehicle ☐ Other Specify: _____

Identify Media and Receptors Affected: (check all that apply)

☐ Air ☐ Groundwater ☐ Surface Water ☐ Sediments ☐ Soil

☐ Wetlands ☐ Storm Drain ☐ Paved Surface ☐ Private Well ☐ Public Water Supply ☐ Zone 2 ☐ Residence

☐ Snow ☐ Unknown ☐ Other Specify: _____

Identify Release and/or Threat of Release Conditions at Site: (check all that apply)

☐ 2 and 72 Hour Reporting Condition(s) ☐ 120 Day Reporting Condition(s) ☐ Other Condition(s)

Describe: _____

RAMs may be conducted concurrently with an IRA only with written DEP approval
URAMs may not be conducted if any 2 or 72 Hour conditions exist at the site.

Identify Oils and Hazardous Materials Released: (check all that apply)

☐ Oils

☐ Unionized Solvents

☐ Heavy Metals

☐ Others Specify: _____

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

☐ Assessment and/or Monitoring Only

☐ Excavation of Contaminated Soils

☐ Re-use, Recycling or Treatment

☐ On Site ☐ Off Site Est. Vol.: _____ cubic yards

Describe: _____

☐ Store ☐ On Site ☐ Off Site Est. Vol.: _____ cubic yards

☐ Deployment of Adsorbent or Containment Materials

☐ Temporary Covers or Caps

☐ Bioremediation

☐ Soil Vapor Extraction

☐ Structure Venting System

☐ Product or NAPL Removal

SECTION D IS CONTINUED ON THE NEXT PAGE.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking

2 - 12393

D. DESCRIPTION OF RESPONSE ACTIONS (continued):

- ☐ Landfill ☐ Cover ☐ Disposal Est. Vol.: _____ cubic yards
- ☐ Removal of Drums, Tanks or Containers Describe: _____
- ☐ Removal of Other Contaminated Media Specify Type and _____
- ☐ Other Response Actions Describe: _____
- ☐ Groundwater Treatment Systems
- ☐ Air Sparging
- ☐ Temporary Water Supplies
- ☐ Temporary Evacuation or Relocation of Residents
- ☐ Fencing and Sign Posting
- See 310 CMR 40.0442 for limitations on the scope and type of RAMs.
See 310 CMR 40.0464 for performance standards for URAMs.
- ☐ Check here if this RAM or URAM involves the use of Innovative Technologies. DEP is interested in using this information to aid in creating an Innovative Technologies Clearinghouse.
Describe: _____

E. TRANSPORT OF REMEDIATION WASTE: (If Remediation Waste has been sent to an off-site facility, answer the following)

Name of: _____

Town and State: _____

Quantity of Remediation Waste Transported to: _____

SEP 15 1998

F. RAM PLAN:

- ☐ Check here if this RAM Plan received previous oral approval from DEP as a continuation of a Limited Removal Action (LRA).
Date of Oral: _____
- ☐ If a RAM Compliance Fee is required, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. See 310 CMR 40.0444(2) to learn when a fee is not required.
- ☐ Check here if the RAM Plan is proposed for a Transition Site. If this is the case, you may need to attach an LSP Evaluation Opinion prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for further information about Transition Sites.

G. RAM COMPLETION STATEMENT:

- ☐ If a RAM Compliance Fee is required in connection with submission of the RAM Completion Statement, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. You owe this fee when submitting a RAM Completion Statement if you received oral approval of a RAM that continued an LRA, and have NOT previously submitted a RAM Plan and accompanying fee.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement, you must submit a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the RAM Completion Statement.

H. URAM NOTIFICATION:

- Identify Location Type: (check all that apply) ☒ Public Right of Way ☐ Utility Easement ☐ Private Property
- Identify Utility Type: (check all that) ☒ Sanitary/Combined Sewerage ☐ Water ☐ Drainage ☐ Natural Gas
- ☐ Telephone ☐ Steam Lines ☐ Telecommunications ☐ Electric ☐ Other Specify: _____
- ☒ Check here if you provided DEP with previous oral notification of this URAM. Date of Oral: 09/08/98
- ☐ Check here if the property owner was NOT contacted prior to initiation of the URAM. If this is the case, you must attach an explanation of why the owner was not contacted, including the date and time when contact ultimately occurred.
- ☒ Check here if this URAM will occur in connection with the construction of new public utilities. If this is the case, document the nature and extent of encountered contamination, the scope and expense of necessary mitigation and the benefits and limitations of project alternatives.

With the exception stated below, the person undertaking the URAM must provide the name and license number of an LSP engaged or employed in connection with the URAM:

LSP Name: William R. Swanson LSP License Number: 6406

LSP Information is not required if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by a Hazardous Material or a mixture of a Hazardous



**RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking

2 - 12393

I. URAM COMPLETION STATEMENT:

- ☐ Check here if this URAM was limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement.

J. LSP OPINION:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> If Section B of this form indicates that a Release Abatement Measure Plan is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> If Section B of this form indicates that a Release Abatement Measure Status Report or a Utility-Related Abatement Measure Status Report is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> If Section B of this form indicates that a Release Abatement Measure Completion Statement or a Utility-Related Abatement Measure Completion Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

- ☐ Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

LSP Name: _____ LSP #: _____ Stamp: _____

Telephone: _____ Ext.: _____

FAX: (optional) _____

Signature: _____

Date: _____

An LSP Opinion is not required for a Utility-Related Abatement Measure Notification.

An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or a mixture of Hazardous Material and Oil.

K. PERSON UNDERTAKING RAM OR URAM:

Name of Town of Grafton

Name of Fred G. Haffty Title: Superintendent

Street: 9 Depot Street

City/Town: South Grafton State: MA ZIP Code: 01560-0000

Telephone: 508-839-8526 Ext.: _____ FAX: 508-839-8523

- ☐ Check here if there has been a change in person undertaking the RAM or URAM.



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM

Release Tracking

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0482 - 0465 (Subpart D)

2 - 12393

L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or URAM: (check one)

- ☒ RP or PRP Specify: ☒ Owner ☐ Operator ☐ Generator ☐ Transporter Other RP or PRP: _____
- ☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ Any Other Person Undertaking RAM or URAM Specify _____

M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM:

I, Fred G. Haffty, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: [Signature]
(signature)

Title: Superintendent

For: Town of Grafton
(print name of person or entity recorded in Section K)

Date: 15 Sept 98

Enter address of person providing certification, if different from address recorded in Section

Street: _____

City/Town: _____

State: _____

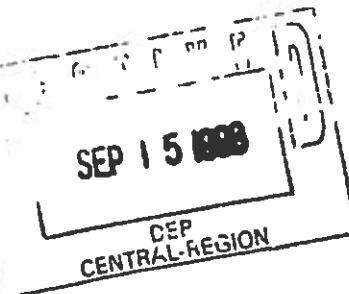
ZIP Code: _____

Telephone: _____

Ext.: _____

FAX: (optional) _____

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.





Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking

2 - 12393

A. SITE LOCATION:

Site Name:

Street: Worcester Street

Location Aid: in roadway at #165

City/Town: Grafton

ZIP: 01519-0000

☐ Check here if a Tier Classification Submittal has been provided to DEP for this Release Tracking Number.

Related Release Tracking Numbers That This RAM or URAM: RTN 2-12437

B. THIS FORM IS BEING USED TO: (check all that apply)

☐ Submit a RAM Plan (complete Sections A, B, C, D, E, F, J, K, L and M).

☐ Check here if this HAM Plan is an update or modification of a previously approved written HAM Plan.

Date Submitted:

☐ Submit a RAM Status Report (complete Sections A, B, C, E, J, K, L and M).

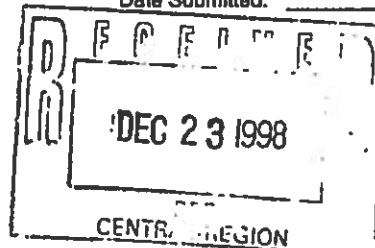
☐ Submit a RAM Completion Statement (complete Sections A, B, C, D, E, G, J, K, L and M).

☐ Confirm or Provide URAM Notification (complete Sections A, B, H, K, L and M).

☒ Submit a URAM Status Report (complete Sections A, B, C, E, J, K, L and M).

☐ Submit a URAM Completion Statement (complete Sections A, B, C, D, E, I, J, K, L and M).

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.



C. SITE CONDITIONS:

☐ Check here if the source of the Release or Threat of Release is known.

If yes, check all sources that apply: ☐ UST ☐ Pipe/Hose/Line ☐ AST ☐ Drums ☐ Transformer ☐ Boat

☐ Tanker Truck ☐ Vehicle ☐ Other Specify: _____

Identify Media and Receptors Affected: (check all that apply)

☐ Air ☐ Groundwater ☐ Surface Water ☐ Sediments ☒ Soil

☐ Welllands ☐ Storm Drain ☐ Paved Surface ☐ Private Well ☐ Public Water Supply ☐ Zone 2 ☐ Residence

☐ School ☐ Unknown ☐ Other Specify: _____

Identify Release and/or Threat of Release Conditions at Site: (check all that apply)

☐ 2 and 72 Hour Reporting Condition(s) ☐ 120 Day Reporting Condition(s) ☐ Other Condition(s)

Describe: _____

RAMs may be conducted concurrently with an IRA only with written DEP approval
URAMs may not be conducted if any 2 or 72 Hour conditions exist at the site.

Identify Oils and Hazardous Materials Released: (check all that apply)

☒ Oils

☐ Unidentified Solvents

☐ Heavy Metals

☐ Others Specify: _____

D. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

☐ Assessment and/or Monitoring Only

☐ Excavation of Contaminated Soils

☐ Re-use, Recycling or Treatment

☐ On Site ☐ Off Site Est. Vol.: _____ cubic yards

Describe: _____

☐ Store ☐ On Site ☐ Off Site Est. Vol.: _____ cubic yards

☐ Deployment of Absorbent or Containment Materials

☐ Temporary Covers or Caps

☐ Bioremediation

☐ Soil Vapor Extraction

☐ Structure Venting System

☐ Product or NAPL Recovery

SECTION D IS CONTINUED ON THE NEXT PAGE.



**RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking

☐ - ☐

D. DESCRIPTION OF RESPONSE ACTIONS (continued):

- ☐ Landfill ☐ Cover ☐ Disposal Est. Vol.: _____ cubic yards ☐ Groundwater Treatment Systems
- ☐ Removal of Drums, Tanks or Containers ☐ Air Sparging
- Describe: _____ ☐ Temporary Water Supplies
- ☐ Removal of Other Contaminated Media ☐ Temporary Evacuation or Relocation of Residents
- Specify Type and _____ ☐ Fencing and Sign Posting
- ☐ Other Response Actions Describe _____
- See 310 CMR 40.0442 for limitations on the scope and type of RAMs.
See 310 CMR 40.0464 for performance standards for URAMs.
- ☐ Check here if this RAM or URAM involves the use of Innovative Technologies. DEP is interested in using this information to aid in creating an Innovative Technologies Clearinghouse.
- Describe _____

E. TRANSPORT OF REMEDIATION WASTE: (If Remediation Waste has been sent to an off-site facility, answer the following)

Name of _____

Town and State: _____

Quantity of Remediation Waste Transported to _____

RECEIVED
BUREAU OF WASTE SITE CLEANUP
DEC 23 1998

F. RAM PLAN:

- ☐ Check here if this RAM Plan received previous oral approval from DEP as a continuation of a Limited Removal Action (LRA).
- Date of Oral _____
- ☐ If a RAM Compliance Fee is required, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. See 310 CMR 40.0444(2) to learn when a fee is not required.
- ☐ Check here if the RAM Plan is proposed for a Transition Site. If this is the case, you may need to attach an LSP Evaluation Opinion prior to undertaking the RAM, if not previously provided. See 310 CMR 40.0600 for further information about Transition Sites.

G. RAM COMPLETION STATEMENT:

- ☐ If a RAM Compliance Fee is required in connection with submission of the RAM Completion Statement, check here to certify that the fee has been submitted. You MUST attach a photocopy of the payment. You owe this fee when submitting a RAM Completion Statement if you received oral approval of a RAM that continued an LRA, and have NOT previously submitted a RAM Plan and accompanying fee.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the RAM Completion Statement, you must submit a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the RAM Completion Statement.

H. URAM NOTIFICATION:

- Identify Location Type: (check all that apply) ☐ Public Right of Way ☐ Utility Easement ☐ Private Property
- Identify Utility Type: (check all that) ☐ Sanitary/Combined Sewerage ☐ Water ☐ Drainage ☐ Natural Gas
- ☐ Telephone ☐ Steam Lines ☐ Telecommunications ☐ Electric ☐ Other Specify: _____
- ☐ Check here if you provided URM with previous oral notification of this URAM Date of Oral _____
- ☐ Check here if the property owner was NOT contacted prior to initiation of the URAM. If this is the case, you must attach an explanation of why the owner was not contacted, including the date and time when contact ultimately occurred.
- ☐ Check here if this URAM will occur in connection with the construction of new public utilities. If this is the case, document the nature and extent of encountered contamination, the scope and expense of necessary mitigation and the benefits and limitations of project alternatives.

With the exception stated below, the person undertaking the URAM must provide the name and license number of an LSP engaged or employed in connection with the URAM:

LSP Name: _____ LSP License Number: _____

LSP information is not required if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by a Hazardous Material or a mixture of a Hazardous



Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-106

RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking

☐ - ☐

I. URAM COMPLETION STATEMENT:

- ☐ Check here if this URAM was limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated by either a Hazardous Material or a mixture of a Hazardous Material and Oil.

If any Remediation Waste will be stored, treated, managed, recycled or reused at the site following submission of the URAM Completion Statement, you must submit either a Release Abatement Measure (RAM) Plan or a Phase IV Remedy Implementation Plan, along with the appropriate transmittal form, as an attachment to the URAM Completion Statement.

J. LSP OPINION:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> If Section B of this form indicates that a Release Abatement Measure Plan is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> If Section B of this form indicates that a Release Abatement Measure Status Report or a Utility-Related Abatement Measure Status Report is being submitted, the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

> If Section B of this form indicates that a Release Abatement Measure Completion Statement or a Utility-Related Abatement Measure Completion Statement is being submitted, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000 and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

- ☐ Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

LSP Name: William R. Swanson

LSP #: 6406

Stamp:

Telephone: 617-252-8458

Ext: 1

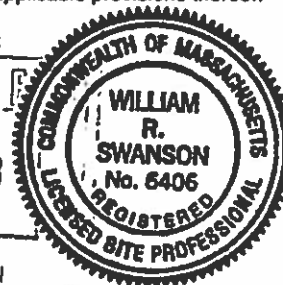
FAX: (optional) _____

Signature: [Signature]

DEC 23 1998

Date: 12/4/98

ESP
CENTRAL REGION



An LSP Opinion is not required for a Utility-Related Abatement Measure Notification.

An LSP Opinion is not required for a URAM Completion Statement if the URAM is limited to the excavation and/or handling of not more than 100 cubic yards of soil contaminated by Oil, or not more than 20 cubic yards of soil contaminated either by Hazardous Material or a mixture of Hazardous Material and Oil.

K. PERSON UNDERTAKING RAM OR URAM:

Name of Town of Grafton

Name of Fred G. Haffty

Title: Superintendent

Street: 9 Depot Street

City/Town: South Grafton

State: MA

ZIP Code: 01560-0000

Telephone: 508-839-8526

Ext: _____

FAX: _____

508-839-8523

- ☐ Check here if there has been a change in person undertaking the RAM or URAM.



**RELEASE & UTILITY-RELATED ABATEMENT
MEASURE (RAM & URAM) TRANSMITTAL FORM**

Pursuant to 310 CMR 40.0444 - 0446 and 310 CMR 40.0462 - 0465 (Subpart D)

Release Tracking


☐ - ☐

L. RELATIONSHIP TO SITE OF PERSON UNDERTAKING RAM or URAM: (check one)

- ☒ RP or PRP Specify: ☒ Owner ☐ Operator ☐ Generator ☐ Transporter Other RP or PRP: _____
- ☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)
- ☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))
- ☐ Any Other Person Undertaking RAM or URAM Specify _____

M. CERTIFICATION OF PERSON UNDERTAKING RAM OR URAM:

I, Fred G. Haffty, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By:  Title: Superintendent
(signature)

For: Town of Grafton Date: 18 DEC 98
(print name of person or entity recorded in Section K)

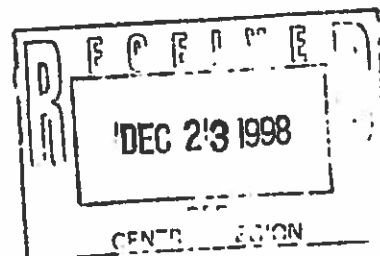
Enter address of person providing certification, if different from address recorded in Section

Street: _____

City/Town: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ FAX: (optional) _____

YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.



**Worcester St., Grafton, Massachusetts
Utility-related Abatement Measure Status Report**

- Gasoline contaminated soil was excavated on September 13, 1998 and November 13, 1998, for the new sewer main on Worcester Street opposite #165 Worcester Street and for the service connection to #165 Worcester Street, respectively.
- Per agreement with the owner of #165 Worcester Street and his LSP, EcoTec, Inc., 172 Lincoln Street, Worcester, Massachusetts, the excavated gasoline contaminated soil will be disposed as part of the response action (RTN 2-12437) currently being undertaken at #165 Worcester Street, relative to the removal of underground storage tanks. Approximately 40 cubic yards of soil from the two excavations is currently being stored in the rear of the property at #165 Worcester Street along with soil from the tank removals. It is anticipated all of the soil will be removed from the property by the end of December 1998 and disposed of at Bardon Trimount. The completed bill of lading will be included in the URAM Completion Statement.
- Three confirmatory soil samples were collected from the service connection excavation at the property line of #165 Worcester Street. The samples are being analyzed for VPH. Results will be available in late December 1998 and included in the URAM Completion Statement.



Camp Dresser & McKee Inc.

consulting
engineering
construction
operations

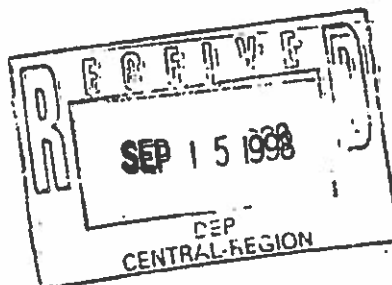
Ten Cambridge Center
Cambridge, Massachusetts 02142
Tel: 617 252-8000 Fax: 617 621-2565

SCANNED

2-12 393

September 14, 1998

Mr. Paul Spano
DEP Central Region
Bureau of Waste Site Cleanup
627 Main Street
Worcester, Massachusetts 01608



Subject: Town of Grafton
Worcester Street
URAM Notification

Dear Mr. Spano

On Behalf of the Town of Grafton, Massachusetts, enclosed is a Utility-related Abatement Measure (URAM) Notification for the gasoline contamination on Worcester Street, Grafton, Massachusetts. As you indicated during our telephone conversation on September 9, 1998, we have not prepared a Release Notification Form. Please note that the VPH and EPH results for the soil sample collected from the excavation will be available on September 15, 1998.

If you have any questions, please contact me at (617) 628-7938.

Very truly yours,

CAMP DRESSER & McKEE INC.


James H. Winkler, P.E.

APPROVED BY:


William R. Swanson, P.E., LSP

cc: F. Haffly, Town of Grafton
A. Bonilla, CDM
M. Retzky



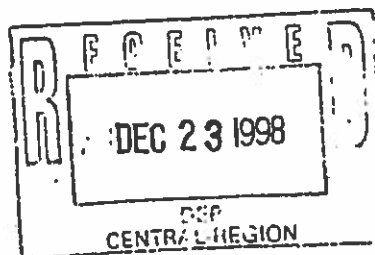
Camp Dresser & McKee Inc.

consulting
engineering
construction
operations

Ten Cambridge Center
Cambridge, Massachusetts 02142
Tel: 617 252-8000 Fax: 617 621-2565

December 4, 1998

Mr. Paul Spano
DEP Central Region
Bureau of Waste Site Cleanup
627 Main Street
Worcester, Massachusetts 01608



Subject: Town of Grafton .
Worcester Street
URAM Status Report

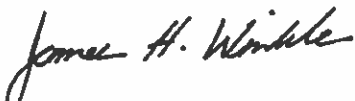
Dear Mr. Spano,

On behalf of the Town of Grafton, Massachusetts, enclosed is a Utility-related Abatement Measure (URAM) Status Report for the gasoline contamination in the roadway opposite #165 Worcester Street, Grafton, Massachusetts. The URAM Completion Statement will be submitted in January 1999.


If you have any questions, please contact me at (617) 628-7938.

Very truly yours,

CAMP DRESSER & McKEE INC.


James H. Winkler, P.E.

APPROVED BY:


William R. Swanson, P.E., LSP
Vice President

cc: F. Haffty, Town of Grafton
A. Bonilla, CDM
M. Retzky, CDM

named/winkler/spano.wpd

EcoTec, Inc.
Environmental Consulting Services
172 Lincoln Street
Worcester, MA 01605
Phone: 508-792-2225 Fax: 508-792-2226

MEMORANDUM**Date:** 10/1/98**To:** Bill Phillips**OCT - 2 1998****From:** Arthur Allen & Paul McManus, L.S.P.**Re:** 165 Worcester St., Grafton**Via Fax:** 792 7621

page 1 of 1

This is the site we spoke about earlier today. It is a former gasoline station, currently being used for auto repairs. We were on-site today, soon after five U.S.T.'s were excavated. There were two, 1,000 g. gasoline tanks; one, 2,000 g. gasoline tank; one 1,000 g. #2 fuel oil tank and one, 500 g. waste oil tank. These are the only known UST's on the site.

When we arrived on the site, the three gasoline UST's were out of the ground, empty and loaded on trucks. The 2,000 g. and one of the 1,000 g. tanks were badly corroded and perforated. One of the 1,000 g. tanks appeared to be sound. We sampled (PID headspace) underneath where the gasoline UST's had been, at approximately 10 feet below surface (groundwater interface). The PID results were 280 ppm. These results indicate a 72 hour reporting condition. The site owner informed us that he has previously reported associated with a URAM which took place in Worcester Street adjacent to the site. We will have them report again and follow up with form BWSC 103.

The waste oil tank and the #2 fuel oil tank are partially underneath the building and cannot be removed without risk of building collapse. The fire chief has approved the cleaning and filling in place of these tanks with concrete slurry. Before we arrived, the fuel oil tank had been pumped dry and there was a limited amount of staining in the surrounding soils with PID headspace readings of 22 ppm. While we were on site, a crew was removing sludge from the waste oil tank.

There is no Imminent Hazard that we are aware of. There is only a slight sheen on the groundwater and no drinking water wells that we are aware of (neighborhood serviced by municipal water). Due to the fact that the excavation contractor has heavy equipment on site and that there is no free product on the groundwater we would like to excavate and stockpile the contaminated soil. We request verbal IRA approval to excavate up to 300 cubic yards of soil.

Please advise.

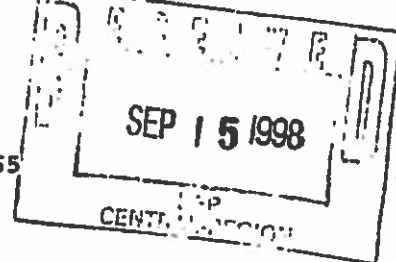
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RTN 2-12393

ALPHA ANALYTICAL LABORATORIES

Eight Walkup Drive
Westborough, Massachusetts 01581-1019
(508) 898-9220

EXHIBIT C



MA:M-MA-086 NH:200395-B/C CT:PH-0574 ME:MA086 RI:65

CERTIFICATE OF ANALYSIS

Client: Murphy & Associates

Laboratory Job Number: L9604473

Address: 214 Worcester Street

Invoice Number: 84702

Grafton, MA 01519

Date Received: 01-JUL-96

Attn: Bob Murphy

Date Reported: 10-JUL-96

Project Number:

Delivery Method: Client

Site:

ALPHA SAMPLE NUMBER	CLIENT IDENTIFICATION	SAMPLE LOCATION
L9604473-01	#1	
L9604473-02	#2	

Authorized by: 

Scott McLean - Laboratory Director

**ALPHA ANALYTICAL LABORATORIES
CERTIFICATE OF ANALYSIS**

MA:M-MA-086 NH:200395-B/C CT:PH-0574 ME:MA086 RI:65

Laboratory Sample Number: L9604473-01

Date Collected: 29-JUN-96

#1

Date Received : 01-JUL-96

Sample Matrix: LIQUID

Date Reported : 10-JUL-96

Condition of Sample: Satisfactory

Field Prep: None

Number & Type of Containers: 1 Glass

PARAMETER	RESULT	UNITS	RDL	REF	METHOD	DATES PREP ANALYSIS	ID
Total Metals				1	3005/3050		
Lead, Total	0.97	mg/l	0.05	1	6010	02-Jul 09-Jul	GF
Polynuclear Aromatics by GC/MS				1	8270	03-Jul 03-Jul	IG
Acenaphthene	ND	ug/l	2.9				
2-Chloronaphthalene	ND	ug/l	3.0				
Fluoranthene	ND	ug/l	2.9				
Naphthalene	ND	ug/l	2.2				
Benzo(a)anthracene	ND	ug/l	3.1				
Benzo(a)pyrene	ND	ug/l	3.8				
Benzo(b)fluoranthene	ND	ug/l	3.5				
Benzo(k)fluoranthene	ND	ug/l	3.5				
Chrysene	ND	ug/l	3.1				
Acenaphthylene	ND	ug/l	2.6				
Anthracene	ND	ug/l	2.5				
Benzo(ghi)perylene	ND	ug/l	5.0				
Fluorene	ND	ug/l	2.7				
Phenanthrene	ND	ug/l	2.6				
Dibenzo(a,h)anthracene	ND	ug/l	4.9				
Indeno(1,2,3-cd)pyrene	ND	ug/l	4.7				
Pyrene	ND	ug/l	2.8				
1-Methylnaphthalene	ND	ug/l	7.0				
2-Methylnaphthalene	ND	ug/l	1.8				

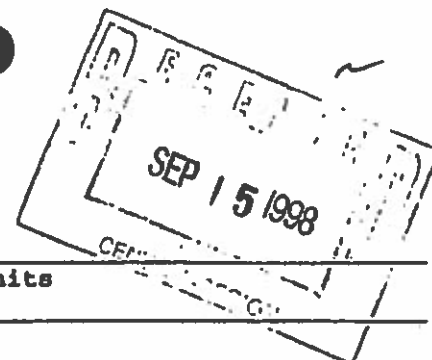
SURROGATE RECOVERY

Nitrobenzene-d5	73.0	†
2-Fluorobiphenyl	74.0	†
4-Terphenyl-d14	92.0	†

Comments: Complete list of References and Glossary of Terms found in Addendum I

ALPHA ANALYTICAL LABORATORIES
QUALITY ASSURANCE BATCH DUPLICATE ANALYSIS

Laboratory Job Number: L9604473



Parameter	Value 1	Value 2	RPD	Units
Total Metals	DUPLICATE for sample(s) 01-02			
Lead, Total	0.97	1.0	4	mg/l

ALPHA ANALYTICAL LABORATORIES
QUALITY ASSURANCE BATCH SPIKE ANALYSES

Laboratory Job Number: L9604473

Parameter	% Recovery
-----------	------------

Total Metals	SPIKE for sample(s) 01-02
--------------	---------------------------

Lead, Total	99
-------------	----

**ALPHA ANALYTICAL LABORATORIES
ADDENDUM I**

REFERENCES

1. Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. EPA SW-846. 1986.

GLOSSARY OF TERMS AND SYMBOLS

REF Reference number in which test method may be found.

METHOD Method number by which analysis was performed.

ID Initials of the analyst.

LIMITATION OF LIABILITIES

Alpha Analytical, Inc. performs services with reasonable care and diligence normal to the analytical testing laboratory industry. In the event of an error, the sole and exclusive responsibility of Alpha Analytical, Inc., shall be to re-perform the work at it's own expense. In no event shall Alpha Analytical, Inc. be held liable for any incidental consequential or special damages, including but not limited to, damages in any way connected with the use of, interpretation of, information or analysis provided by Alpha Analytical, Inc.

We strongly urge our clients to comply with EPA protocol regarding sample volume, preservation, cooling, containers, sampling procedures, holding times and splitting of samples in the field.

Invoice Date

10-JUL-96

Invoice Number

84702

ALPHA ANALYTICAL LABORATORIES, INC.
8 Walkup Drive
Westborough, MA 01581
508-898-9220

I N V O I C E

BILL TO:
Bob Murphy
Murphy & Associates
214 Worcester Street

Grafton, MA 01519

Account #: MURPHY-G
Project #: MURPHY-G

REPORT TO:
Bob Murphy
Murphy & Associates
214 Worcester Street

Grafton, MA 01519

Job #: L9604473
PO#:

Qty	Matrix	Description	Unit Price	Total Price
2	LIQUID	Polynuclear Aromatic Hydrocarbons	\$ 125.00	\$ 250.00
2	LIQUID	Total Lead-ICP	\$ 12.00	\$ 24.00
2	LIQUID	Total Metal Prep	\$ 15.00	\$ 30.00

pd 7/10/96 V# 5729 \$ 304.00
Cg.

Total Amount Due: \$ 304.00

**Town of Grafton, Massachusetts
Worcester Street
URAM PLAN**

Introduction

This Utility-Related-Abatement Measure (URAM) Plan describes the remedial actions to be undertaken to address the presence of gasoline in subsurface soil in Worcester Street, Grafton, Massachusetts at #165 Worcester Street during the installation a new sewer main. The location of the site on Worcester Street is shown in Figure 1. This URAM Plan has been prepared in accordance with the Massachusetts Contingency Plan (310 CMR 40.0462).

Background

On September 8, 1998, as a General Contractor (A.F. Amorello & Sons, Inc.), under contract with the Town of Grafton, was installing a new 8-inch sewer main on Worcester Street, the presence of gasoline contaminated soil was identified in the excavation approximately 8 feet below ground surface along the roadway at #165 Worcester Street. The contaminated soil area is shown on Figure 2. Work was immediately stopped and the Town of Grafton Fire Department was called to assess the situation. Upon inspection of the conditions, the Fire Chief, Mr. Raymond Guilmette contacted Mr. Paul Spano of the DEP Central Region to apprise them of the situation. DEP instructed the Town to hire a Licensed Site Professional. Steel plates were placed over the excavation.

According to the owner of # 165 Worcester Street, there are three abandoned underground storage tanks in the driveway to the property immediately adjacent to the property line. The owner indicated that before he purchased the property, the former owner had operated a service station and that the tanks had been used for gasoline storage.

On September 9, 1998, the steel plates were removed to 1) evaluate if an imminent hazard condition exists and 2) assess the nature and extent of the release with respect to its potential impact on the sewer main installation project.

CDM, using an organic vapor monitor, monitored the air space immediately after the steel plates were removed from above the excavation. No detectable readings were measured by the instrument. In addition, there was no olfactory evidence of gasoline odors emanating from the excavation. On the previous day, the air space had been screened for explosive conditions and no detectable readings were measured with a Lower Explosive Level (LEL) monitoring device. Our evaluation of the conditions indicates that an imminent hazard condition as defined under the MCP, 40.0321 does not exist.

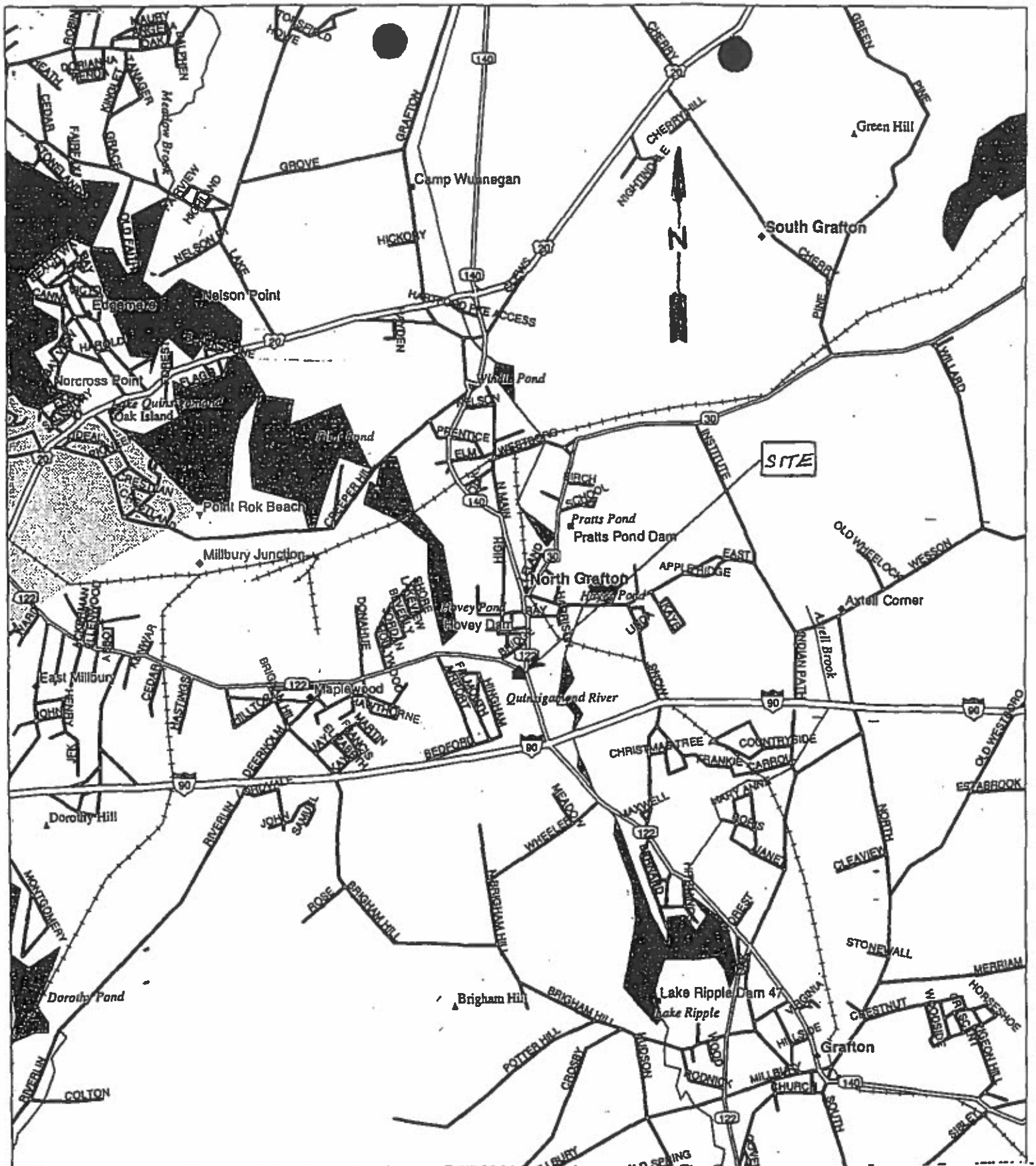


FIGURE 1
TOWN OF GRAFTON
URAM PLAN
LOCATION PLAN

CDM collected three soil samples at two locations for headspace testing and subsequent laboratory analysis if warranted. The first sample was collected in the excavation where work had been terminated at Station MH+195 feet, on the previous day. A sample (GRAF-01) was collected from the sidewall (towards # 165 Worcester Street) of the excavation, approximately 8 feet below ground surface. The headspace reading from the sample was 153 ppm. The sample was submitted to CDM's Laboratory for VPH and EPH analysis. The second sample (GRAF-01A) was collected at the same location, but at approximately 4 feet below ground surface. The headspace reading from the sample indicated no detectable level. The third sample (GRAF-02) was collected 13 feet away at Station MH +208 feet. This sample was also collected in the sidewall of the excavation toward # 165 Worcester Street at approximately 8 feet below ground surface. The headspace reading from the sample indicated no detectable level.

Results of the laboratory analysis of Sample GRAF-01 will be available on September 15, 1998.

Work Plan

Given the urban nature of the site, there is no convenient manner in which to relocate the sewer alignment. Therefore, the General Contractor, A.F. Amorello & Sons, Inc. will perform the URAM as described below with assistance from the Town of Grafton Fire Department. The Fire Department will be on site during all activities.

Excavation

Clean overlying soil (above 7.5 feet) will be segregated and stockpiled separately from contaminated soil as excavation proceeds during the installation of new sewer. Overlying soil will be considered "clean" based on the absence of olfactory evidence of contamination. Contaminated soil will be hauled to the town cemetery located less than one mile from the site. Soil will be placed on 20 mil. thick high density polyethylene sheeting and will be covered with 10 mil. nylon reinforced polyethylene sheeting. Any rock removal will be performed using rock drills with fire retardant foam applied over the rock. The Fire Department will provide and apply the foam.

Confirmatory Testing

Confirmatory soil samples will be collected from the sidewalls and bottom of the excavation. Headspace analysis will be performed on these samples in the field utilizing an OVM. Soil samples will be analyzed for EPH and VPH.

Disposal

Contaminated soil will be recycled at Bardon Trimount. Final determination of the off-site facility will be based on the level of contamination and the physical properties of the excavate. Transportation will be performed by a common carrier under a DEP Bill of Lading.

OSHA Compliance

All work performed between Stations MH 195 feet and MH +208 feet will be performed in accordance with OSHA 1926.65. A Certified Industrial Hygienist (CIH) will prepare the Contractor's Site Health and Safety Plan (SHASP). The SHASP will be implemented by a Site Safety and Health Officer provided by the CIH.